



Connecticut State Colleges and Universities
Response to CSCU Request for Compliance Review
RFP #CSCU-1383142

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Scope Of Work

Grand River Solutions, Inc. ("GRS" or "Reviewers") was asked by the Connecticut State Colleges and Universities ("CSCU") to conduct an independent review of known facts related to former Interim Chancellor John Maduko's ("former Interim Chancellor" or "Maduko") alleged misconduct and CSCU's institutional response to the disclosure of alleged misconduct to determine whether the response was consistent with internal and external best practices and obligations and whether further institutional response is recommended. This report contains our review and evaluation, as well as suggestions and recommendations for improvements in keeping with federal and state laws, current and emerging best practices, and the System's mission, values, and resources. This Report does not constitute factual findings regarding the underlying conduct and is not intended to affect the disposition of any related proceedings.

Executive Summary

There was an overall failure on the part of multiple individuals to initiate and follow established policy and procedures for reporting, responding to, and addressing reports of sexual harassment, and in particular, reports of sexual harassment involving an interim System Chancellor. The actions and inactions of individuals that led to the failure, along with the impact of those actions or inactions, are identified broadly in this summary and in detail in this report.

The then-Chair and Vice Chair of the Board of Regents and key administrators within CSCU failed to report sexual harassment to the Systemwide Title IX Coordinator, acted outside of CSCU policy, and in one instance, acted in place of the Systemwide Title IX Coordinator.

Although the Board of Regents received minimal training on CSCU's requirements for responding to and handling reports of sexual misconduct, the then-Chair and Vice

Chair failed to recognize that the information they had received regarding policies and processes would need to be applied evenly to all members of the CSCU community, including reports of misconduct by the Interim Chancellor. Key administrators within CSCU received training on responding to and handling reports of sexual misconduct, but either did not retain the information or did not appreciate the importance of adhering to System policies and processes, resulting in a failed response lacking in timeliness, safeguards, supportive measures, and appropriate communications, among other failings. Further, for those employees who experienced sexual harassment, there was a general lack of understanding of reporting options for employees, the availability of supportive measures, as well as a lack of trust in reporting processes, in part due to concerns about how confidential information had been handled and potentially shared in the past. Finally, the Board's vetting process for the Interim Chancellor position lacked industry-standard hiring practices, and as a result, critical information was not solicited or considered by those members of the Board with responsibility for the vetting process.

Methodology

From June 22 through July 30, 2026, the Reviewers met with 13 current and former CSCU employees, a former independent contractor, as well as three current and former Board members. These individuals were involved in reported matters concerning the former Interim Chancellor, either as impacted parties, witnesses, or individuals involved with the response and resolution process.

The Reviewers also reached out to five others who were suggested as potentially having received inappropriate comments or messages from the former Interim Chancellor. None responded to our outreach.

In addition to conducting interviews, the Reviewers read through the materials provided by CSCU, including policies, procedures, complaints, case files, and training materials.

The materials provided by CSCU included:

- Complaint File 1 (concerning Impacted Party 1)
- Complaint File 2 (concerning Impacted Party 4)

- Complaint File 3 (concerning Impacted Party 2)
- Policies and procedures
 - HR Policies for Management/Conf/Professional Personnel
 - Policy for the Appointment of a CSCU System Chancellor
 - Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy ("Nondiscrimination Policy")
 - Interim Connecticut State Colleges and Universities Resolution Process Procedure for Title IX Sexual Harassment ("Title IX Procedure")
 - Interim Connecticut State Colleges and Universities Resolution Process Procedure for BOR Policy 4-13 Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy ("Non-Title IX Procedure")
- Responsible Employee training deck, recording, announcement, training records, and reminder
- Training records for Impacted Party 1, the Executive Director for System Project Management, General Counsel, and the Vice Chancellor for External Affairs
- CT State Environment Witness Report File, intake notes and initial report
- April 29, 2026, Notice of Discretionary Dismissal to Impacted Party 1 and Maduko
- April 29, 2026, Amended Notice of Allegations to Impacted Party 1 and Maduko
- April 24, 2026, resignation email from Maduko
- April 23, 2026, Letter to Maduko regarding administrative leave
- April 22, 2026, Letter to Maduko regarding not reporting to work or entering CSCU property
- April 20, 2026, Notice of Investigation to Maduko, and the email it was enclosed in
- April 20, 2026, email confirmation by Maduko of receipt of the above Notice of Investigation
- Timeline developed by CSCU of actions taken in April 2026 in responding to the report
- Handoff memo to GRS from CSCU's Chief Compliance Officer

In addition, the following evidence was provided by interviewees:

- From the Vice Chancellor for External Affairs

- May 6, 2026, email from CSCU's Communications Director about redacting and reviewing documents requested under the Freedom of Information Act
- May 18, 2026, email from the Vice Chancellor for External Affairs regarding responding to an WFSB Consumer Investigative Reporter
- Notice Regarding Former Interim Chancellor; Talking Points; Record Redactions; Proposed Notice to BOR
- From the Vice Chair of the Board of Regents: June 12, 2026, Talking Points for BOR Update on Chancellor Search
- From Impacted Party 4: June 18, 2018, Police Department Review and Climate Investigation, report by Shipman & Goodwin LLP
- From the former Chair of the Board of Regents
 - Timeline
 - Email chain pertaining to a public relations response

The following was gathered by Grand River Solutions from publicly available sources:

- May 4 Board Resolution: Initiating an Independent Review of the Circumstances, Response and Remediation Regarding the Interim Chancellor's Resignation
- Policy on the Appointment and Evaluation of CSCU Chancellor
- CSCU Leadership Continuity Policy
- CSCU Code of Conduct for Regents, Employees & Volunteers

Chronology of Institutional Response

This assessment included the creation of a chronological reconstruction of the institutional response from the initial disclosure of alleged misconduct through the resolution, based on a review of documentary evidence and interviews. Although the bulk of the timeline focuses on the response to Impacted Party 1's¹ disclosures in April

¹ Each person alleged to have experienced sexual harassment, retaliation, or an unwanted sexual or sexualized communication from Maduko is referred to as an "Impacted Party."

2026, the chronology also describes prior disclosures and responses from three other impacted parties.

The Reviewers determined that most of the relevant facts regarding CSCU's response to these disclosures were undisputed, except in instances when interviewees disagreed about the context in which statements or actions were taken. Those disagreements, highlighted below, were not so significant as to materially alter the Reviewers' overall findings about the deficiencies in CSCU's response.

October 31, 2022

- Impacted Party 2, a Connecticut State Community College ("CT State") administrator, reported complaints about former Interim Chancellor Maduko's conduct to the former Vice President of Diversity, Equity & Inclusion ("VP of DEI") at CT State. She reported that she had heard rumors about Maduko (who was then President of CT State) having engaged in inappropriate incidents involving women at Naugatuck Community College ("NVCC") and Housatonic Community College ("HCC"). Impacted Party 2 stated the former VP of DEI took notes of their conversation and told her he would handle the complaints. Impacted Party 2 stated that she was unaware of any follow-up actions.
 - As part of this Review, the Reviewers asked if any such reports were stored in the CT State database and were informed that no such reports currently appear in that database.

Unspecified Date(s), 2022

- When interviewed as part of this Review, the former VP of DEI at CT State stated that he was aware of reports about Maduko's treatment of women from 2022, and that he forwarded any such concerns to someone in the Office of General Counsel for the CSCU System; he was uncertain which person or office received this information. General Counsel stated that she did not recall receiving any such complaints.
 - The Reviewers requested a search of the former VP of DEI's emails to locate documentation of concerns being forwarded as per the above, but no responsive emails were found.

May 2024

- Impacted Party 1, a high-level administrator, began receiving inappropriate and sexual messages and comments from Maduko, who was then President of CT State.

October 25, 2024

- Impacted Party 2 went to dinner with a colleague, Impacted Party 3. During the dinner, Impacted Party 3 showed Impacted Party 2 a message Maduko had sent Impacted Party 3 by LinkedIn messenger. Maduko's message referred to having seen Impacted Party 3 in a "sexy orange dress" she had worn to a Board of Regents meeting, and included him asking if she would give Maduko a "private tour alone" at the campus where she worked. Impacted Party 2 stated she reported this incident to the then-Interim Systemwide Title IX Coordinator for CSCU. The former Interim Systemwide Title IX Coordinator reached out to Impacted Party 3, who has confirmed with the Reviewers that she did not feel that she had experienced sexual harassment or "anything worth reporting." Impacted Party 3 did not want to take any further action, and thus no further action was taken.
 - Emails provided by CSCU confirmed that the former Interim Systemwide Title IX Coordinator made outreach to Impacted Party 3 to offer resources and properly documented the conversations with Impacted Parties 2 and 3. Those records were stored in the former Interim Systemwide Title IX Coordinator's separate files, not a shared CSCU database or file. Impacted Party 2 reported receiving no follow-up about her report; the Reviewers note that third-party reporters generally do not receive follow-up from the Title IX Coordinator, and thus we have no concern that Impacted Party 2 did not receive any follow-up information.
 - The former Interim Systemwide Title IX Coordinator discussed with the former interim Assistant Vice Chancellor of HR and Labor Relations ("AVC of HR") whether it would be a good idea for either the AVC of HR or the then-Chancellor to have a conversation with Maduko to remind him that sending sexualized messages is inappropriate, and to refrain from engaging in similar conduct in the future. It is unknown whether any such conversation took place.

December 2024

- The former Interim CSCU Systemwide Title IX Coordinator presented a sexual misconduct report to a joint committee meeting of the Board that covered a forthcoming training about reporting obligations. CSCU policy refers to individuals who are required to report as “Mandatory Reporters.”

January 2025

- Impacted Party 4, a director at a CT State campus, began receiving inappropriate, sexual messages from Maduko.

January – April 2025

- The Chief of Compliance for the CSCU System met with the Chancellor’s cabinet and System Office executive leadership several times to discuss modifications to CSCU’s sexual misconduct policies. Themes discussed included the unchanged reporting requirements under these policies. The substance of the forthcoming Responsible Employee training was also discussed, and it was requested that all executives assist in getting their employees to complete the training.

February 20, 2025

- A NVCC staff member and union executive board member stated that at a meeting of CT State and NVCC officials attended by several dozen people, including the NVCC CEO and the former CT State VP of DEI, Maduko “rushed” the podium, was rude to the NVCC CEO, and said, “When I get up here to speak, I look for people in the audience that look like me,” a remark she perceived as “a racial derogatory statement.” In an undated union meeting, this NVCC staff member reported hearing Maduko say that he screamed at his staff members. No reports were made about this incident, or of other undated incidents of bullying and yelling at employees, until on or about June 1, 2026, when this NVCC staff member filed a report with the Chief Compliance Officer for CSCU. The NVCC staff member explained that she did not report these incidents earlier because the former Interim Chancellor “led with fear and intimidation” and she feared that any retaliation could compromise her union work.

- The former CT State VP of DEI stated that he heard Maduko make a statement similar to the one reported by the NVCC staff member, but heard it as an inclusive statement (welcoming everyone), rather than an exclusive one intended to exclude those who did not look like Maduko. Therefore, based on the former CT State VP's understanding of that incident, and the lack of any contemporaneous complaints of any similar incident(s), there would have been nothing, at that time, to enter into the CT State database of harassment complaints.

April 2025

- Impacted Party 1 and the Vice Chancellor of External Affairs ("Vice Chancellor") reported to CSCU General Counsel comments made to them by the then-Chair of the CSCU Board of Regents ("the Chair") about terminating a woman who had made a sexual harassment complaint.
- While interviewees agreed the then-Chair made the statement, they disagreed on the context in which it was made. The Chair acknowledged making that comment to them, but explained that Impacted Party 1 and the Vice Chancellor had been pushing him to terminate former Chancellor Cheng, who was under public scrutiny for reported misuse of public funds; the then-Chair stated that he was explaining that he would terminate only after an investigation, and then related a story from 30 years prior and while at an organization outside of CSCU, when he had almost fired someone accused of misconduct but later learned that the complainant in that case had filed a fraudulent report, and so he instead fired the person who had made the fraudulent report. Impacted Party 1 and the Vice Chancellor agreed that the Chair's comment involved a situation from early in the Chair's career and outside of CSCU, but they did not recall a contemporaneous discussion about wanting the Chair to take action against former Chancellor Cheng and instead felt that the comment "came out of nowhere."
- General Counsel corroborated hearing this report from Impacted Party 1 and the Vice Chancellor. Her understanding was that the incident did not involve a CSCU employee, had occurred long ago, and therefore did not warrant further action. Therefore, she took no further action.

- For purposes of this Review, we make no findings as to the exact statement by the Chair, nor the context, as the relevant inquiry is whether General Counsel should have taken additional steps.

April 2025

- All CSCU employees, including executive staff, were assigned training on their reporting obligations. During the April to June assignment window, all System employees not on leave or otherwise unavailable completed the training.

May 2025

- Impacted Party 2 stated that she was asked by two Regents (whose names she did not identify) her professional opinion on the candidates for interim Chancellor. She responded that she was concerned about Maduko's leadership and that the System could not afford any further scandals. She stated that neither Regent asked her any follow-up questions.

June 2025

- Impacted Party 1 stated that she informed General Counsel that it would be bad for the System and for her if Maduko became interim Chancellor, and added that General Counsel did not follow up on the comment to ask Impacted Party 1 what she was referring to. General Counsel stated that she did not recall Impacted Party 1 making such a comment.
- The Board of Regents engaged in the vetting process of Maduko and other candidates. The Vice Chair stated that for Maduko's candidacy, they did not perform a background check, review performance or personnel records, or obtain recommendations because Maduko was an internal candidate for an interim position and thus had already gone through a background check when first hired and was well known to the Board. General Counsel asked the then-Interim Systemwide Title IX Coordinator if there were any reports naming Maduko. The Interim Systemwide Title IX Coordinator told General Counsel, verbally and in writing, about the report regarding the message from Maduko to Impacted Party 3. General Counsel stated that she then passed along the information she had gathered to the Board Chair and Vice Chair.

- The Director of Equity and Civil Rights at CT State recalled that he was asked to search office records for reports on Maduko and did not find any reports of sexual harassment or other sexual misconduct. He cannot recall who asked him to conduct the search.

June 26, 2025

- The CSCU Board of Regents announced the appointment of Maduko as Interim Chancellor.

July 2025

- The former VP of DEI at CT State stated he was suspended for raising complaints of labor law violations and other concerns.
 - The Reviewers are aware of at least one whistleblower complaint filed by the former VP of DEI; the allegations are unrelated to this review.

October 1, 2025

- Impacted Party 4 submitted her resignation from CT State, effective November 13, 2025. Impacted Party 4 stated that she resigned due to a pattern of sexual harassment by Maduko that had occurred since January 2025 in person and online through text messages, including a private Signal chat. She disclosed this conduct to a friend, who happened to be a colleague, and thus was a mandatory reporter. Neither Impacted Party 4 nor her friend made a report of sexual harassment to Human Resources or the campus Title IX Coordinator. Impacted Party 4 described her resignation as a “constructive discharge” resulting from Maduko’s misconduct and her belief (based on Maduko’s specific comments) that institutional officials, such as the Vice President of Human Resources at CT State (“VP of HR”), were under Maduko’s improper influence, making reporting his behavior futile and likely to result in retaliation. Impacted Party 4 believed that any report involving employee sexual misconduct would need to go through Human Resources, and she did not know that employees could file a report with the campus Title IX Coordinator.
 - To provide further context for her decision not to report, Impacted Party 4 stated she had previously made a report to CT State (using the online CT State reporting form) on behalf of a student employee who had

disclosed sexual harassment. Impacted Party 4 asked a colleague how to file the report and then filled out an online reporting form. Impacted Party 4 stated that, the next day, multiple individuals were commenting to her about the report and knew the names of the parties. As she explained, this diminished any overall confidence in campus reporting options.

November 11, 2025

- Impacted Party 4 emailed the then-VP of HR at CT State, "I am hoping to have a confidential conversation with you, or at the very least, you can point me in the right direction regarding the matter." The VP of HR responded the next day asking for specifics. Impacted Party 4 responded that she was concerned about putting anything in writing, and that the reason for her departure was the concern she wished to share. The VP of HR scheduled the meeting for November 18, 2025.
- Impacted Party 4 cancelled that meeting and decided that she would instead file a Commission on Human Rights and Opportunities ("CHRO") complaint, which was received by CSCU on or after May 13, 2026. She explained that making a disclosure to Maduko's "apparent ally" in HR was not as safe and as appropriate as filing with CHRO.

January 9, 2026

- During a virtual meeting attended by Impacted Party 2, Maduko, and CSCU's Assistant Vice Chancellor of Human Resources and Labor Relations ("AVC of HR"), Maduko told Impacted Party 2 her interim contract would not be continued for "budget reasons." Impacted Party 2 believed her non-renewal was retaliation for reporting Maduko's misconduct. The non-renewal was later reversed following disclosures about Maduko's misconduct.
 - Impacted Party 2 stated her belief that a high-level administrator on Maduko's staff had told Maduko that Impacted Party 2 had made a report about Maduko to the Interim Title IX Coordinator. When interviewed, the high-level administrator denied having had this information. Two witnesses, however, stated that the identified administrator had looked for Impacted Party 2's report about Maduko and disclosed it to him, with

one of those two witnesses stating that the high-level administrator had admitted to having gone through records to find the information. Based on this, Impacted Party 2 as well as the two witnesses shared concerns that misconduct reports were not kept private.

April 13, 2026

- Around 9 a.m., Impacted Party 1 received several text messages with an unwanted sexual advance from Maduko, which she described as a “direct solicitation for [her] to participate in or observe him engaging in a sexual act.”
- Impacted Party 1 was in her office when she received the message, and she showed it to the Vice Chancellor. She later told the Executive Director for System Project Management (“Executive Director”) she had received it. Both of these executive staff members told Impacted Party 1 she needed to report this conduct.
- Around 5:30 p.m., Impacted Party 1 spoke with General Counsel for about 90 minutes about the history of Maduko’s conduct and showed her screenshots of sexual messages sent by Maduko, including a picture showing Maduko in his undergarments holding his erect penis.
- General Counsel did not report this information to the Systemwide Title IX Coordinator. General Counsel told the Reviewers that Impacted Party 1 did not want to share the information about Maduko’s misconduct with anyone else and feared losing her job as a result of reporting. General Counsel stated that she kept the report confidential at Impacted Party 1’s request, believing she should or could do so. General Counsel advised Impacted Party 1 they would talk the next day.
- Neither the Vice Chancellor nor the Executive Director made a report to the Systemwide Title IX Coordinator. The Vice Chancellor stated he thought a report to the General Counsel was a reporting option, and thus any reporting obligation was fulfilled by Impacted Party 1’s disclosure to General Counsel. The Executive Director stated that he wanted to give Impacted Party 1 time to decide if she wanted to report it before he filed a report.

April 14, 2026

- Impacted Party 1 and General Counsel did not meet. Because there were no supportive measures yet in place, Impacted Party 1 continued to communicate with Maduko in order to perform her regular duties. Impacted Party 1 recalled having to speak on the phone for one hour and four minutes with Maduko, who made comments and innuendo related to her sex life and a reference to an “anal plug.”
- Impacted Party 1 told the Vice Chancellor and Executive Director that she had reported to General Counsel and that they should not take further action while General Counsel determined next steps.
- General Counsel stated that she gathered information on how to retain an outside firm to conduct an investigation.

April 15, 2026

- No supportive measures for Impacted Party 1 had yet been put into place. Impacted Party 1 stated that she attended an unexpected morning virtual meeting with Maduko and college presidents, and later in the day was required to attend an in-person budget meeting with Maduko, after which Maduko closed the door, resulting in a one-on-one in-person meeting. Impacted Party 1 shared concerns about this meeting with the Vice Chancellor. Towards the end of the day, General Counsel told Impacted Party 1 they would meet the next day.

April 16, 2026

- No supportive measures for Impacted Party 1 had yet been put into place. Around 10 a.m., Impacted Party 1 and General Counsel met for the second time since Impacted Party 1's April 13 disclosure. Impacted Party 1 shared additional sexual communications she had received from Maduko. She stated General Counsel asked her why she had replied with phrases like “sure” and “lol” to a message showing a “penis-shaped statue with the caption, ‘to scale,’” and Impacted Party 1 told her she had been navigating a power dynamic and feared professional consequences from escalating the situation. Impacted Party 1 recalled General Counsel told her that General Counsel had never had a

situation like this and was strong and “not one to be fucked with” by a supervisor, which Impacted Party 1 interpreted as a victim-blaming statement. General Counsel recalled telling Impacted Party 1 that she was sorry for Impacted Party 1’s experience and noted that she had been fortunate during the course of her career to not have had a similar experience, and saying to Impacted Party 1 that she (General Counsel) projected a “don’t fuck with me attitude.”

- Impacted Party 1 recalled that General Counsel told her they needed to follow a specific process for investigating an “agency head,” but General Counsel did not explain that process to Impacted Party 1.
- The Executive Director stated that after Impacted Party 1 met with General Counsel, Impacted Party 1 told him that General Counsel was expecting the Executive Director and the Vice Chancellor to meet with her about the misconduct. The Vice Chancellor and the Executive Director then reported their knowledge of Maduko’s conduct to General Counsel. The Executive Director stated that General Counsel told him that the allegations would be reviewed under a process for agency heads, and to “keep the circle tight,” which he took to mean that he was to refrain from telling anyone about Maduko’s conduct toward Impacted Party 1.
- Impacted Party 1, the Vice Chancellor, and General Counsel had lunch and discussed next steps including that outside counsel would likely be retained.
- Impacted Party 1 continued to attend in-person meetings with Maduko during the day. Impacted Party 1 stated she received a message from General Counsel that evening asking to meet the next day.

April 17, 2026

- No supportive measures for Impacted Party 1 had yet been put into place.
- Impacted Party 1 and General Counsel met around 9:15 a.m. to discuss additional messages Maduko had sent Impacted Party 1 in the past and the potential investigation by outside counsel.
- Later, Impacted Party 1 disclosed Maduko's misconduct to the AVC of HR.
- After this disclosure, the AVC of HR met with General Counsel, who confirmed that General Counsel was handling the matter through the process for “agency heads.” The AVC of HR told the Reviewers that she was unaware of which

process or policy was being used to address the complaint. The AVC of HR also noted that CSCU policies on harassment and discrimination did not include any exemption for the Chancellor.

- Impacted Party 1 met with the AVC of HR and General Counsel again later in the day.

April 18, 2026

- No supportive measures for Impacted Party 1 had yet been put into place.
- Around 6:30 p.m., General Counsel texted the then-Board Chair and Vice Chair and informed them that she needed to speak with them to report an important development. The Vice Chair told them that she would not be available until 10:30 p.m., and they agreed to talk at that time.
- At 10:30 p.m., the AVC of HR and General Counsel called the then-Board Chair and Vice Chair to report sexual harassment by Maduko against an unnamed employee who had requested confidentiality. Participants in this call agreed that General Counsel informed the then-Board Chair and Vice Chair that Maduko had sexually harassed the unnamed employee, although they disagreed about some of the details of that disclosure. General Counsel stated she told the then-Board Chair and Vice Chair that the conduct included Maduko's inviting the impacted employee to engage in a video call while he "self-pleasured," that there was a photo of him wearing undergarments holding himself, and that this behavior had been occurring prior to that. The then-Board Chair recalled that General Counsel stated only that she had seen an image of Maduko in a compromising position and that the conduct had been going on for two years. The Vice Chair recalled being informed that there was "supporting evidence." The AVC of HR stated that General Counsel told them the conduct had been going on for two years and included many text messages and images; the AVC of HR also stated that General Counsel made clear that the ongoing conduct was "egregious."
- On behalf of the Board of Regents, the then-Board Chair and Vice Chair directed General Counsel to engage a law firm to conduct an independent investigation, protect the impacted employee(s), allow the impacted employees to work from home if necessary, and support the privacy of the parties. Because Maduko was working out of state the following week, they did not put a no-

contact directive in place or take any other action. The Reviewers note that Maduko's being out of town would not prevent Maduko from texting, emailing, and/or sending sexual and inappropriate images to Impacted Party 1, nor would it prevent him from calling her.

- Despite having previously referenced a specific process for "agency heads" General Counsel did not describe such a process in response to the then-Board Chair's direction to engage a law firm to conduct an investigation.

April 19, 2026

- No supportive measures for Impacted Party 1 had yet been put into place.
- Impacted Party 1 stated she communicated with the AVC of HR by text message and phone, and that the AVC of HR told her that the Board had been notified and that, pending a meeting between the Board and Maduko on April 23, the "status quo" would be maintained, and she would continue contact with him.
- General Counsel stated she contacted attorneys from Shipman & Goodwin LLP to conduct an investigation. No policy or process had yet been identified that would govern this investigation.
 - CSCU indicated to the Reviewers that only the CHRO, can investigate an allegation of sexual harassment by or against an agency head. Despite having previously raised the issue of having a different process for an "agency head," neither General Counsel nor the outside law firm raised either this impediment, or the need to go through the CHRO, prior to launching the law firm's investigation.

April 20, 2026

- A partial, but ineffective, supportive measure is put in place (no-contact directive).
- Impacted Party 1 recalled receiving a phone call from the AVC of HR and General Counsel in the morning notifying her that the Board knew her identity and that outside counsel would be contacting her to investigate under the "agency head" process. Impacted Party 1 recalled being upset about this process, and when she asked why the Systemwide Title IX Coordinator was not

involved, General Counsel told her Title IX did not apply because the case did not involve students. Impacted Party 1 stated that General Counsel also told her that Maduko would remain in his position, a no-contact directive would be put in place, and any communications between Impacted Party 1 and Maduko would go through General Counsel.

- The Executive Director stated that it was his understanding that all communications between Impacted Party 1 and Maduko were supposed to go through him.
- General Counsel stated she met with Impacted Party 1 on April 20 and told her that Maduko would be informed of a no-contact directive and that Shipman & Goodwin would be reaching out to Impacted Party 1 to meet for the interview.
- General Counsel stated she attended a virtual meeting with Shipman & Goodwin attorneys to discuss the investigation process; the then-Board Chair and Vice Chair were also present. During the discussion, they discussed the possibility of placing Maduko on administrative leave but decided there was no need to do so as Maduko was out of state at the time. (All participants agreed on the next steps to obtain additional information for the investigation and to implement a no-contact directive between the parties.
 - The Reviewers note that Maduko's being out of state did not impact Maduko's ability to send inappropriate texts or images to Impacted Party 1 or otherwise contact her.
- General Counsel emailed a letter to Maduko notifying him that he had allegedly "engaged in behavior that is in violation of CSCU policy(ies)" and that the Board had retained Shipman & Goodwin to investigate. General Counsel directed Maduko not to discuss the matter with anyone who could be a witness except investigatory officials, General Counsel, or the AVC of HR, and not to engage in any form of retaliation towards anyone participating in the matter. The no-contact directive was not mentioned in this letter. It is noted that no specific CSCU policy was referenced in the letter, nor any of the rights or protections that would normally be included in any Notice of Investigation, such as the right to an advisor, the right to offer witnesses and evidence, or the right to supportive measures. General Counsel did not believe that there was a need to identify a specific policy or process at that time.

- According to Impacted Party 1, on or around this date, General Counsel suggested to Impacted Party 1 that either the Vice Chancellor or the Executive Director should walk her from her office to her car each day due to the fear of physical harm by Maduko that had been expressed by Impacted Party 1.
 - One witness noted that this was not necessary, as the Vice Chancellor and Impacted Party 1 already walked together to and from the parking area to the office each day, and had been doing so for a long period of time, prior to Impacted Party 1's April 13, 2026, report.

April 21, 2026

- Impacted Party 1 emailed General Counsel and the AVC of HR at 9 a.m. requesting guidance on how to navigate job responsibilities and operational continuity, such as communications requiring her to copy in Maduko, based on the no-contact directive. Impacted Party 1 stated she met with General Counsel and the AVC of HR at 10:30 a.m. and that General Counsel was dismissive of her concern about needing to work one-on-one with Maduko to accomplish her duties as Chief of Staff.
- Impacted Party 1, the Vice Chancellor, General Counsel, the Chief Compliance Officer, and the Communications Director attended an unrelated meeting to discuss sexual harassment matters at CSU and UConn. During the meeting, when asked if Title IX was only for students, the Chief Compliance Officer said, "absolutely not, it includes visitors, staff, faculty, anyone touching our operations."

April 22, 2026

- Impacted Party 1 met with two attorneys from Shipman & Goodwin between 2:00 p.m. and 4:30 p.m. Impacted Party 1 was not informed of the right to have an advisor present for that interview.
- After the interview, Impacted Party 1 met with the AVC of HR and the Executive Director and shared frustration with the lack of a clear process.
- Impacted Party 1 then met with the Chief Compliance Officer to report sexual harassment by Maduko. The AVC of HR joined their meeting. After learning about the events that occurred since Impacted Party 1's disclosure on April 13,

the Chief Compliance Officer recalled feeling disbelief that the response was outside their procedures.

- The Chief Compliance Officer stated that after meeting with Impacted Party 1, he went to General Counsel's office to ask why Maduko had not been put on leave and to ensure that the response would adhere to Title IX obligations set forth in CSCU policy. In recounting their conversation to the Reviewers, neither the Chief Compliance Officer nor General Counsel mentioned discussing how CSCU's response would be impacted, if at all, by a state law requiring CHRO involvement for complaints by or against an agency head, such as the Interim Chancellor.
- Later that evening, General Counsel, the AVC of HR, the then-Board Chair, and the Vice Chair met to discuss additional evidence obtained to date.
- The Chief Compliance Officer stated that he spoke to Impacted Party 1 that evening over the phone to discuss the interim measures to be put in place. Overnight, the Chief Compliance Officer received a written report from Impacted Party 1 of her allegations.
- General Counsel emailed a letter to Maduko directing him not to report to work on April 23, to refrain from attending a NECHE meeting, and "to continue to refrain from any contact in any form with the Complainant." He was directed not to be present at any CSCU institution. The letter did not indicate Impacted Party 1's name or the specific allegations under investigation.

April 23, 2026

- Impacted Party 1 met with the Chief Compliance Officer and the Systemwide Title IX Coordinator to explain the Title IX process under CSCU policy and give Impacted Party 1 the opportunity to share more information. Neither shared with her the CHRO/DAS process.
- The Chair and General Counsel met with Maduko to notify him of specific allegations. According to the then-Board Chair, General Counsel informed Maduko that the investigation would continue, but given all of the evidence, Maduko may want to strongly consider resigning.
- General Counsel sent Maduko written notice via email and U.S. mail that he was placed on administrative leave "for the purpose of conducting an investigation

related to inappropriate text and other verbal and written communications sent to or with a subordinate employee.”

April 24, 2026

- Maduko submitted his written formal resignation to the then-Board Chair by email. Maduko then posted a LinkedIn message stating that he was stepping away from the position for family reasons, and multiple Board members “liked” the message.
- Later that day, the remaining Board members were informed of the allegations against Maduko and of his resignation.

April 28, 2026

- The Systemwide Title IX Coordinator received an updated written complaint from Impacted Party 1.

April 29, 2026

- The Systemwide Title IX Coordinator sent Impacted Party 1 and Maduko an Amended Notice of Allegations detailing conduct alleged to have occurred between May 2024 and April 2026.
 - The Amended Notice Letter cited to the Interim CSCU Resolution Process Procedure for Title IX Sexual Harassment.
 - The letter also stated: Given the specific circumstances of the alleged Respondent in this matter, the burden is on CSCU, through its external designee, to gather evidence, investigate the allegations, and hold a hearing at which a final determination is made, subject to appeal.
 - There is no reference to CHRO in the Notice Letter, nor to any inability to investigate because Maduko is an agency head.
- The Systemwide Title IX Coordinator sent Impacted Party 1 and Maduko formal notification of the decision to dismiss the case using the discretionary dismissal process. The decision to dismiss the case was based on three main factors:
 - The person accused no longer poses an ongoing risk to the CSCU community.
 - CSCU cannot require the person accused to take part in the process.
 - CSCU no longer has the authority to discipline the person accused.

- The Systemwide Title IX Coordinator explained, “Respondent’s resignation has the effect of the highest-level sanction available for the institution to impose, i.e., separation from the institution.”
- The parties were provided 10 business days to appeal. Neither party appealed the dismissal. Impacted Party 1 stated that she did not appeal because she believed doing so would be futile and that the dismissal determination would not change, given Maduko’s resignation.

May 26, 2026

- Impacted Party 4 met with the Systemwide Title IX Coordinator to discuss her complaint against Maduko. She reported that the Systemwide Title IX Coordinator told her there was nothing to be done about her concerns related to Maduko because Maduko had resigned. When interviewed, the Systemwide Title IX Coordinator stated that he explained to her some of the allegations may fall under the 4.13 policy, although not all. He also told the Reviewers that, had she filed an internal report, “it would have likely been dismissed.”

Phase 1 Findings

For Phase 1, the Reviewers sought to identify the existence of any ongoing harm arising from the former Interim Chancellor’s conduct and identify available remediation as well as specific recommendations for implementing those remedies.

Before our discussion, below, of any ongoing harm arising from the former Interim Chancellor’s conduct, it is important to differentiate between supportive measures and remedial measures, and when such measures are normally put into place.

Supportive Measures

Supportive measures are non-disciplinary, non-punitive, individualized services for those impacted by sexual harassment or other sexual misconduct, that are designed to restore or preserve access to an institution’s programs or activities. Supportive measures are also designed to protect the safety of all parties (complainants and respondents) and to deter future discrimination, harassment, or retaliation. Because supportive measures are tailored to each individual’s situation, there is no specific list of all supportive measures that might be available. In cases involving employees, some

of the more common supportive measures include a no-contact directive between the parties, workplace arrangements that keep the parties separated, leaves of absence for one party or the other, safety escorts, and/or referrals to mental health support resources. Supportive measures are usually short-term, most often implemented following a report or disclosure of potential policy violation through the investigation and resolution process.

Remedial Measures

Remedial measures follow an investigation process, and are steps taken in response to the findings of that investigation. An investigation is the process the University uses to determine whether alleged conduct has (a) occurred as alleged (findings of fact); and (b) if so, whether such conduct violates University policy (findings of policy). Following the completion of the investigation, the Title IX Coordinator is then charged with, among other things, determining whether sanctions or discipline are to be applied to the respondent, whether remedies are to be provided to the complainant, and whether preventive steps to deter future misconduct should be implemented. Remedial measures are actions or steps provided to a complainant after all fact-finding is complete to address any harm that resulted as part of the misconduct identified during the investigation, and to prevent such actions from happening again. A determination of the proper remedy is helped by having factual findings from the investigation, thus enabling the Coordinator to tailor any remedial actions to the specific findings about the harm and impact of that harm.

It is important to note that remedies for complainants are separate from sanctions or discipline accorded to respondents. As a result, whether a respondent is or is not a current member of the University's community is separate from the remedies that might be appropriate to offer a complainant following an investigation. And, it is only possible to issue remedies to a complainant after an investigation has occurred and findings have been made as to whether policy has been violated.

Supportive and Remedial Measures for Individuals As-Yet Unknown to CSCU

To determine whether there were additional individuals who may have experienced harm because of Maduko's conduct, the Reviewers made outreach to several employees who may have witnessed or experienced Maduko engaging in

inappropriate behaviors involving women in the registrars' offices at NVCC and HCC. Those individuals did not respond to outreach. Additionally, the Reviewers asked individuals interviewed whether they had knowledge of additional individuals who may have experienced harm because of Maduko's conduct, and no one interviewed provided the names of any individuals who they understood to have been sexually harassed by Maduko.

Supportive and Remedial Measures for Individuals Already Identified to the Reviewers by CSCU

When the System did not timely recognize the need for supportive measures prior to Maduko's resignation, it obviated the opportunity to provide timely supportive measures.

Supportive Measures

All Impacted Parties

Ongoing supportive measures should be offered to each Impacted Party. It is recommended that the Systemwide Title IX Coordinator work with each Impacted Party to design supportive measures appropriate to the circumstances for each individual impacted party. Such measures should, at a minimum, include providing information about resources for no-cost mental health support through the CSCU Employee Assistance Program, and some limited period of paid time off (without using sick time) to recover, if needed. Additionally, the Systemwide Title IX Coordinator should schedule at least one check-in with each impacted party to ascertain the effectiveness of the supportive measures offered and make adjustments as may be appropriate.

Impacted Party 2

In addition to the ongoing supportive measures for all impacted parties, it is recommended that supportive measures for Impacted Party 2 also include the implementation of no-contact directives with any high-level administrators who may have shared with others information regarding her report about Maduko, as well as an assurance that future trainings at both the System and campus levels will explain the importance of keeping any information gleaned about someone else's concern relating to harassment or discrimination as private as possible, consistent with employee

reporting obligations. Further, Impacted Party 2 may benefit from assistance with finding ongoing work within the CSCU system should her interim role come to an end.

Impacted Party 4

CSCU should contact Impacted Party 4 to determine whether Impacted Party wishes to return to work within CSCU. If Impacted Party 4 wishes to return to work within CSCU, she should be offered support in finding a position with a salary comparable to the one she was earning prior to her resignation.

Remedial Measures

As to remedies, the RFP included as part of its scope the requirement to “Analyze and determine whether any individuals may benefit from or should be granted remedial measures,” and that the Reviewers “Provide specific, actionable recommendations for remediation, where applicable.”

The Reviewers have been informed by CSCU that they interpret “remedial measures” and “remediation” as not including any reference to remedies such as back-pay for time lost due to the harassment, compensation for time off to recover from the effects of sexual harassment, or lost income due to either harassment or retaliation. Instead, CSCU has stated that the reference to remedies and remediation in the RFP “is a subsection related to ongoing harm rather than past harm specifically because we want to ensure appropriate deference to CHRO’s legal authority by not seeking legal determinations or infringing on their authority to determine the appropriate remedies for the alleged harassment by the former Interim Chancellor based on their process (under relevant CT case law, CHRO Hearing Officers have explicit authority to order reinstatement and back pay as remedies).” Therefore, this report does not include any reference to specific remedies that may be appropriate for any of the Impacted Parties.

Note: Given the role of the Systemwide Title IX Coordinator in ensuring that remedies are appropriate, CSCU may wish to consult with the Systemwide Title IX Coordinator in determining appropriate remedies which might be offered at the early remediation or any other phase at which this may be appropriate.

Phase 2 Findings

In Phase 2, the Reviewers assessed the adequacy of the institutional response based on the Chronology of Institutional Response in Phase 1 measured against applicable standards, providing herein specific recommendations for further action or reform. The applicable standards include federal and state law, CSCU Board policies, and established best practices in higher education for institutional response to allegations of misconduct by senior leadership.

Overall, the Reviewers found the institutional response to be lacking for the following reasons:

- A lack of understanding of the sexual harassment reporting obligations and requirements of all employees at CSCU when they learn of potential sexual harassment regardless of the respondent's position or status.
- A lack of clarity as to whether Board members have sexual harassment reporting obligations.
- A failure by multiple administrators, including key executive administrators within the System office, to understand and follow CSCU processes.
- A lack of understanding by the then-Board Chair and Vice Chair and key executive leadership on the role and responsibility of the Systemwide Title IX Coordinator.
- The decision by one key administrator to effectively assume the role of the Systemwide Title IX Coordinator and address a report of sexual harassment using their own process instead of reporting the harassment to the Systemwide Title IX Coordinator, as required.
- A failure of adequate internal information privacy and security practices within the CSCU System, including a lack of training for CSCU employees and leaders on the harm that can arise from sharing information about another individual's experience of sexual harassment with anyone outside of the official process. This finding is based in part on Impacted Party 4's reported experience of having colleagues comment on a campus-based report she had filed, and multiple individuals sharing their belief that a high-level administrator was able to get information about Impacted Party 2's complaint against Maduko. This does not appear to be the result of the current Systemwide filing system, to which only 3

individuals have access; instead, it appears more likely this was either caused by the way information was stored prior to the establishment of the current Systemwide Compliance Office, or to inappropriate information sharing among colleagues.

- A failure to clearly communicate to each Impacted Party all available investigation and resolution options and processes when sexual harassment and retaliation complaints are made against a Chancellor (whether interim or permanent), potentially curtailing each Impacted Party's knowledge and right to exercise an available resolution option. To the extent that CSCU takes the position that they are precluded from investigating misconduct by the former Interim Chancellor due to his position as "agency head," CSCU should have communicated this to the Impacted Parties and explained the CHRO process, and how that process would intersect with the provision of supportive measures and remedies.
- A failure to investigate an allegation of retaliation so as to determine (a) whether retaliation occurred, (b) who may have been responsible for the retaliation, (c) whether any individual improperly accessed information and provided it to Maduko, knowing this might lead to an adverse employment action, (d) whether Maduko or any other individual intentionally damaged the Impacted Party's reputation so as to ensure she would not be able to find an appropriate position, and (e) if there were a determination that retaliation occurred, what specific remedies would be appropriate.
- A failure to speak with the then-Board Chair regarding his comments to Impacted Party 1 and the Vice Chancellor. As a result, General Counsel lost an opportunity to have two important conversations: (1) General Counsel could have had a brief conversation with the then-Board Chair to share with him the negative impact of his comments, reminded him of the processes currently in place for addressing allegations of harassment, and reminded him of the prohibition against retaliation, and (2) General Counsel could have then returned to Impacted Party 1 and the Vice Chancellor to assure them of CSCU's prohibitions against retaliation and the processes in place to provide such protection, and to let them know that she had reminded the then-Board Chair of the same.

- Insufficient training for Board members and CSCU system administrators on:
 - the obligations of CSCU to address reports of harassment;
 - the importance of following CSCU policies and processes without regard to the status of the respondent;
 - the role and responsibilities of a Title IX Coordinator generally, and the Systemwide Title IX Coordinator in particular;
 - reporting options and the rights and options for complainants, particularly employee complainants;
 - myths and biases about sexual harassment, and about those who engage in sexual harassment, and those who experience sexual harassment;
 - what to say, and avoid saying, when receiving a report so as to avoid making victim-blaming comments;
 - the role of bystanders in preventing and responding to sexual harassment of others;
 - the need to keep private information about reports of sexual harassment or other misconduct and share only with those who have a need to know, such as the Systemwide Title IX Coordinator;
 - the importance of preserving evidence of harassment and how to do so;
 - the role of exit interviews in learning about potential sexual harassment incidents.

A. Whether any systemic conditions may have contributed to or failed to prevent the underlying conduct and whether any policy changes, training, structural modifications, or other institutional actions are warranted and available

The Reviewers identified multiple systemic issues that may have contributed to or failed to prevent the underlying conduct or may have reduced the severity and extent of the underlying conduct.

A Reluctance to Report Misconduct

Maduko was identified as having led through bullying, fear, and intimidation, and some staff reported feeling as though he believed the rules did not apply to him. It appears that Maduko's personality and leadership style may have contributed to a lack of willingness to report his misconduct. However, in addition to the lack of a prompt

response, there are additional systemic issues that also put the CSCU at risk of repeating these patterns even though Maduko is no longer with the System. For example, staff identified that fear of retaliation from reporting predated Maduko's tenure as both President at CT State and Interim Chancellor of the System. This was not solved by Maduko's departure alone, as one staff member at a community college reported feeling pressure not to escalate incidents throughout her more than 30-year tenure working at the college. Further, along with fearing career consequences from reporting, others shared that their own reports, or reports about others, were being "leaked" to others either within their campus or within the System, or could be shared publicly through unredacted FOIA responses. This lack of confidence in the security of sensitive disclosures made others fearful their information would similarly be leaked.

In addition to concerns about potential retaliation and inappropriate disclosure of reported information, the Systemwide Title IX Coordinator shared that there is a "parochial culture" at the institution, that is "very insular" and that individuals operate from a "who you know" mindset when it comes to reporting potential misconduct. Within such a culture, when complainants or those with knowledge of a potential Title IX report only talk to someone they know, can inhibit reporting as individuals with concerns prefer those concerns be addressed through trusted relationships rather than through established System policies and processes.

The instinct to work through established relationships is understandable, especially when concerns relate to sexual harassment. But if those concerns are not promptly brought to the attention of the Systemwide Title IX Coordinator who has the authority and obligation to respond and resolve such concerns, then individuals who experience sexual harassment or other forms of sexual misconduct may be deprived of their rights and protections under established policy.

Recommendations

- Clarify through annual messages from the Chancellor and Presidents that making a report for oneself or on behalf of another is protected activity under CSCU policy, and outline the specific steps that CSCU will take to investigate reported retaliation and remedy it as appropriate.
- Display in a prominent position on the CSCU Office of Compliance Title IX and Nondiscrimination website the purpose of reporting, the benefits to parties of

reporting, and the protection from retaliation. Reporting provides an institution information about incidents of harassment so that they may properly respond to and resolve such complaints; complainants receive information of their rights and options, and the opportunity to help determine how their concerns will be addressed; and individuals who do report are protected from retaliation.

- Display on the CSCU Office of Compliance Title IX and Nondiscrimination website all of the internal and external resources and reporting options that exist, including when and how to make a report to the CHRO.
- Hold employees accountable through HR performance processes for failing to properly report incidents of sexual harassment.
- Strengthen the above concepts and messages in Office of Compliance training and educational materials, and in consistent messaging throughout the System.

Overall Lack of Knowledge by Employees About Who is a Mandated Reporter and the Responsibilities of a Mandated Reporter Under CSCU Policy, Along with a Lack of Understanding that the Policy Applied to All, Including to Executive Leadership

Most employees interviewed knew that all employees, except those identified as confidential employees, were required to report incidents of sexual harassment or sexual misconduct of which they become aware or witness. However, understanding among employees of what positions were identified as confidential under the policy was mixed. As a result, multiple members of the Executive Staff in the System Office failed to make a report of sexual harassment to the Systemwide Title IX Coordinator when they became aware of a report of sexual harassment.

Most of those interviewed from the System office did not understand their reporting obligations despite receiving training at least as recently as spring 2025. It is possible that executive team members did not believe these obligations applied to them, or did not pay adequate attention to the training itself. As noted above, the training appears not to have been comprehensive enough to cover all the issues that can arise in sexual misconduct reporting but nonetheless provided some education on reporting requirements and how to carry them out.

Some of the confusion about reporting obligations is linked to imprecise language in CSCU policy. Notably, the Policy identifies "lawyers" as falling within the category of "Confidential Employees" not bound by mandatory disclosure requirements. While this

could be true in some circumstances, such as if the lawyer is in an attorney-client relationship with the reporting party, it would not apply to General Counsel who represents the institution, rather than any one individual person. Including this language within the Policy creates confusion about reporting obligations.

Likewise, the obligations of Board members are unclear because CSCU's policies do not appear to apply to volunteers such as members of the Board of Regents. Neither Policy 4-13 (Interim Discriminatory Harassment, Nondiscrimination and Title IX Policy) nor the Code of Conduct for Regents, Employees and Volunteers makes clear whether they have specific reporting obligations. Further, there were varying opinions as to whether members of the Board are subject to CSCU policies, which adds to differences of opinion about whether Board members have reporting obligations. This lack of clarity contributed to errors in the present matter and may pose risk in the future should the General Counsel and Board members learn of alleged misconduct by others.

Further, even those employees within the System office who knew they were obliged to report disclosures of sexual harassment misunderstood which office had to receive this information. They mistakenly believed that this reporting obligation could be fulfilled by reporting to either General Counsel, the Chief Compliance Officer, or the Systemwide Title IX Coordinator, especially because it involved an executive within the System office. Thus, when disclosures in this matter were made to General Counsel, at least some individuals believed they had satisfied their reporting obligations, when they had not.

Further, individuals with an obligation to report shared a belief that when a complainant requested confidentiality, the report should not be shared with the Systemwide Title IX Coordinator out of respect for the complainant's wishes. They believed this duty existed even when the person receiving the report was identified as a mandated reporter under the policy. Thus, although these individuals believed they were acting out of respect for and honoring the wishes of the complainant, they were acting outside of their obligation and policy and preventing the complainant from receiving all of the protections and information regarding resolution of their complaint to which they had a right.

Recommendations

- Clarify in the policy that General Counsel and Board members are required to immediately inform the Systemwide Title IX Coordinator of any acts of sexual harassment or sexual misconduct of which they become aware. Additional recommendations to clarify employee reporting obligations are found in the policy feedback below.
- Provide annual training to all employees and Board members on their role as individuals who are required to report any disclosures of sexual harassment or other sexual misconduct to the Systemwide Title IX Coordinator, the importance of doing so, how to do so, all of the information that is required to be shared. This training should include reminders that the policy applies to everyone, regardless of the status of the respondent, as well as reminders about the myths and biases about sexual harassment, and about those who engage in sexual harassment, and those who experience sexual harassment, as well as what to say, and avoid saying, when receiving a report so as to avoid making victim-blaming comments.
- Hold employees accountable through HR performance processes for failing to report incidents of sexual harassment.

Failure to Keep Information Related to Reports of Sexual Harassment Private

The failure to keep private information related to reports of sexual harassment contributes to the potential for actual or perceived retaliation or abuse of process by individuals who do not have a need to know such information. Information regarding sexual harassment complaints should be available only to the Title IX Coordinator and individuals the Title IX Coordinator deems to have a need to know; even then, the Title IX Coordinator might determine that some have a need to know only some part of that information, such as the identity of the respondent but not the name of the complainant.

The Reviewers gathered information showing that several people who would have no reason to have been informed knew of some of the reports. For example, Impacted Parties 2 and 3 (as well as another witness) reported that a high-level administrator

knew of the report Impacted Party 2 had made to the system Title IX Coordinator. Impacted Party 2 also reported that a number of people at different campuses had the same information. Impacted Party 2 believed the widespread sharing of her disclosures contributed to the creation of a hostile environment and the non-renewal of her position.

Although both the CSCU Title IX office and CT State Title IX office have systems in place for recording and tracking complaints, there is concern that others outside of those offices had inappropriate access to that information. The Reviewers note that the “leak” of information about a report made within the CSCU System appears likely to have occurred prior to the hire of the current Systemwide Title IX Coordinator, at a time when the information would have been shared with someone within Human Resources and Labor Relations, and prior to the establishment of the current file storage system. This information should only have been known by the Complainants who made the reports and the appropriate Title IX Coordinators.

Further, there is concern that information about Impacted Party 1’s report and the steps taken to respond to that report exist outside of the CSCU Title IX database system which created an opportunity for that information to become known to those without a role in the Title IX process. The Systemwide Title IX Coordinator confirmed that as of this review, he did not have, nor did he gather, all of the information, documents, materials, notices, and communications associated with the report that Impacted Party 1 made to General Counsel, the AVP of HR, the Vice Chancellor, and the Executive Director, and the steps each took in response to her report. As a result, the Systemwide Title IX Coordinator does not have a complete record of the report made by Impacted Party 1 and of the institution’s efforts to respond to and resolve that report. Further, the sensitive information of that report is unnecessarily and inappropriately spread across multiple offices and individuals who have not been established by the Systemwide Title IX Coordinator as needing to know or possess such information in order to respond to or resolve Impacted Party 1’s concerns.

Recommendations

- The Systemwide Title IX Coordinator should conduct a review of the current systems in place, including any databases, file sharing, email, or other means by which the System or campus offices collect and retain records related to reports

of sexual harassment and sexual misconduct to confirm that only individuals who are part of the response and resolution process have access to the records and information related to reports retained by the Title IX Office.

- The Systemwide Title IX Coordinator should seek all of the information, documents, materials, notices, and communications associated with the report that Impacted Party 1 made to General Counsel, the AVP of HR, the Vice Chancellor, and the Executive Director, and the steps each took in response to her report and include such information in their records regarding that report.
- CSCU should provide trainings, both for those in the System and at any campus, on the importance of not sharing information about reports of sexual harassment or sexual misconduct with anyone other than the Title IX Coordinator, or at the direction of the Title IX Coordinator, and the reasons for the importance of resisting the urge to share information outside of any process.

The Decision or Practice of Not Redacting Identities of Victims of Sexual Harassment When Responding to FOIA Requests

The Reviewers understand that it has not been the general practice of the CSCU System to redact the names of complainants in sexual harassment or sexual assault cases in response to media inquiries or FOIA requests. Although such a practice is in line with the Freedom of Information Commission opinion not to withhold victim names from FOIA requests by *default*, that opinion does not preclude the System from considering, on a case-by-case basis, whether release of victims' names would cause an undue invasion of privacy. By not taking this available measure, victims' highly personal information could forever remain in the public domain through no fault of their own. Current practice signals to individuals within the System that, should they abide by System policies and make a report of sexual harassment, they risk having their identity and personal experiences publicly released. Further, mandatory reporters may be more hesitant to report sexual harassment that has been disclosed to them to the Title IX Coordinator if they know that the information might become public against the wishes of the impacted party. This practice of not conducting a case-by-case analysis acts as a strong deterrent to reporting, making it even more difficult for the System to provide an education and work environment free from sexual harassment.

Recommendations

- To balance the System's obligation to abide by state law, with the impact of public disclosure to victims of sexual harassment and the potential of such disclosures to restrict reporting, the System should develop a practice of assessing whether to disclose victim names on a case-by-case basis.
- In instances when the System does disclose the names of victims or impacted individuals, that the System alert those whose names will be disclosed about the disclosure and offer supportive measures.

Dismissing Title IX Complaints When a Respondent is No Longer Affiliated with the System

When asked about when someone has resigned or left, is it generally the System's practice to dismiss, the Chief Compliance Officer offered various responses. Initially, in an interview, he responded "yes" that it was the general practice to dismiss a case when a respondent was no longer affiliated with the system, and recalled only one other Title IX matter where an employee resigned mid-investigation and it was dismissed. This response was confirmed following his review of his interview notes. However, in a subsequent communication to the Reviewers, the Chief Compliance Officer then said that he was "personally aware of investigations continuing after resignation."

According to the Systemwide Title IX Coordinator, when asked if when a respondent left the institution there has ever been a continuation of a Title IX investigation, he responded not while he had been at CSCU. He further explained that "if a respondent moves completely out of our jurisdiction, then there is not much we can necessarily do because they escape the highest order of sanctioning." However, the Systemwide Title IX Coordinator added that should a respondent return to the institution, then they would re-open the investigation. Additionally, there is an understanding by the Systemwide Title IX Coordinator that depending on the nature of the report, when a case is dismissed from Title IX, the institution does have the ability to refer the matter to be addressed under other university policies, or take steps through other university offices to address the concern.

As CSCU noted in its dismissal letter for Impacted Party 1's matter, the voluntary departure of a respondent "has the effect of the highest-level sanction available for the

institution to impose.” The Reviewers advise that the Compliance Office avoid the actual or perceived practice of dismissing Title IX complaints because a respondent is no longer affiliated with the System, as it prevents the institution from fully addressing its obligations under Title IX to prevent future harm resulting from the same or similar circumstances, and provide appropriate remedy to the complainant. As mentioned earlier in this report, a complainant should be offered remedies as a result of their experience of sexual harassment or other sexual misconduct if such conduct was found to have occurred in violation of CSCU policy. It is only by conducting an investigation that an institution can determine whether a respondent engaged in conduct that would violate its policies, and it is the findings of that investigation report that then help the Title IX Coordinator determine the remedy appropriate to that complainant, and the measures necessary for preventing recurrence.

In this case, multiple individuals engaged in the protected activity of bringing forth complaints or report of sexual harassment, including those that alleged specific harm resulting from the harassment or the reporting of harassment such as loss of position or retaliation. The explanation provided to Complainant by the Systemwide Title IX Coordinator for the decision to dismiss the formal complaint or to not pursue an investigation was because the Respondent was no longer affiliated with the System after resigning. Impacted Party 4 shared that it was explained to her that “her complaint was received, that Maduko was gone, there was no longer an issue.” Impacted Party 2 stated, “They said since Maduko resigned there wasn’t anything they could do. They said they would still investigate but he was not in place, so [they] could not hold him accountable for his conduct.” Impacted Party 1 explained that after there was a formal notice of investigation sent, she was told the complaint had been dismissed discretionarily because Maduko was no longer an employee. She further stated, “They said because he is no longer with the system, they had no jurisdiction. I did not appeal because I could not change that Dr. Maduko resigned.”

It is important to note the allegations at issue were against the Interim Chancellor, who is considered the head of an agency. Applicable state law says that “if a discrimination complaint is made against the executive head of a state agency . . . the complaint shall be referred to the Commission on Human Rights and Opportunities for review and, if appropriate, investigation by the Department of Administrative Services.” CSCU

indicated to these Reviewers that consistent with this law, CSCU cannot investigate complaints by or against the Chancellor (whether interim, temporary, or permanent), and CSCU interprets this requirement as also applying to a *former* agency head. Instead, as per CSCU, the complaint must be referred to CHRO for review and possible investigation.

At minimum, Title IX requires that if a complaint is dismissed on discretionary grounds, such as the resignation of the respondent, or removed to a different process, such as a non-Title IX based disciplinary procedure, that the parties be notified of the change. It is the Reviewers' understanding that the Systemwide Title IX Coordinator and the Compliance Office are aware of the requirement to refer discrimination complaints by or against the Chancellor to CHRO. Thus, it is curious that the Systemwide Title IX Coordinator did not communicate to any of the Impacted Parties either in conversation, email, or through the dismissal letter, that the allegations against the Chancellor could only be handled under another process, the CHRO process, and offer to assist them in engaging that process. Instead, the Complainants were left with the belief that the CSCU system dismissed or would dismiss their allegations against the Chancellor simply because the Chancellor was no longer employed by CSCU. If in this instance the state law was part of the rationale for dismissal, then that reason should have been included in the dismissal notice as per Title IX requirements ("[u]pon a dismissal required or permitted . . . the recipient must promptly send written notice of the dismissal and reason(s) therefor simultaneously to the parties"). The dismissal must include a rationale because the dismissal is subject to appeal, and the Parties can only meaningfully consider appealing if they know the full rationale for the dismissal. However, the dismissal letter sent by the Systemwide Title IX Coordinator indicated that the matter was closed, and that CSCU "no longer has any mechanism by which to encourage" his participation in an investigation. The letter also said that if circumstances change, and Maduko attempted to return to CSCU in some way, "CSCU will reopen the matter immediately," which is not accurate, given CSCU's interpretation of the requirement that only CHRO can investigate (and, even then, only if the Impacted Party files with CHRO).

Recommendations

- Refrain from characterizing a resignation as "has the effect of the highest-level sanction available for the institution to impose," because this is not accurate. A resignation is an action an employee takes voluntarily; it can preserve benefits and right of future hire, and can occur without an investigation and without any determination that a policy was violated because evidence supports that the alleged conduct more likely than not occurred. A termination or expulsion may also be accompanied by access restrictions, which do not automatically accompany a resignation.
- Cease the actual or perceived general practice of not conducting an investigation whenever a respondent is no longer affiliated with the system.
- Make case-by-base determinations about whether to dismiss a formal complaint based on the individual facts of the matter. This approach should be used for all discrimination and harassment complaints, whether sex-related or not. Include the rationale for dismissals in the dismissal letters, including whether the dismissal is because of a lack of ability to investigate and remedy when a complaint is made against a Chancellor.
- Include in all dismissal letters information about the option to file with CHRO, along with an explanation as to whether the CHRO process will run as parallel but separate to a CSCU process. The dismissal should also explain that only the complainant may file with CHRO, as CSCU cannot refer a case by filing on a complainant's behalf.
- Develop a protocol that can be used in any complaint of harassment or discrimination filed by or against a CSCU Chancellor (or anyone in a role requiring a similar protocol), including a determination as to how supportive measures and remedies will be handled. The protocol should clarify whether CSCU and CHRO will have any coordination to process the matter or whether CSCU is handing the case over completely, and whether CSCU will offer the remedies it deems appropriate as part of the early mediation phase of the CHRO process. The protocol should take into account federal preemption issues, a determination on how to meet CSCU's Title IX obligations as a recipient of federal funds, and how to provide parties with their rights under Title IX.

Lack of Ability for the Systemwide Title IX Coordinator to Know of All Reports Made to Title IX Coordinators on Each Campus

Currently, the Title IX offices on each campus within the system, and the Title IX office in the systemwide office, operate as independent, self-contained units. As such, they utilize different systems and methods for receiving and tracking reports of sexual harassment. Consequently, a report made to a campus Title IX office may never be known to the system office or to any other campus Title IX office. Thus, should a Respondent move from a position on one campus to another position on another campus, or from a campus position to a position within the System office, their information as a respondent may never be known to the new campus or system office.

Recommendation

- The Systemwide Title IX Coordinator should develop a process together with all campus Title IX Coordinators to ensure that reports of sexual harassment and sexual misconduct are shared with the System office. That information should be maintained by the Systemwide Title IX Coordinator for appropriate purposes, including reviewing the suitability of candidates for hiring and promotion, for implementing corrective action and, when appropriate, preventive trainings and communications. Note: Other systems, such as the Universities of Wisconsin and California State University system, have addressed this issue by developing policies that avoid “passing the harasser” from campus to campus.

Lack of an Understanding of the Role of the Title IX Coordinator

In this instance, the individuals who responded to Impacted Party 1’s report did not understand that certain duties and decisions are to be carried out only by a Title IX Coordinator. For example, only the Title IX Coordinator can determine the sufficiency of supportive measures, determine the method to be used to respond to a complaint, initiate an investigation, and carry out the other stages of the complaint resolution process including: Placing the parties on notice of the investigation; overseeing the investigation process; reviewing the investigation report (and in some instances the hearing report) for sufficiency in addressing the allegations; overseeing the appeals process; reviewing whether the discipline (if any) is reasonably designed to stop the

harassment and prevent it from happening again, and; determining and ensuring implementation of remedies for the complainant. Additionally, the Title IX Coordinator must receive training to fulfill the obligations of their role. In this matter, the General Counsel inappropriately assumed the role of the Coordinator by responding to the report, including initiating an investigation, without notifying the Title IX Coordinator. The Board Members notified of the report lacked the training and experience with Title IX and CSCU policies to object to the General Counsel's actions or otherwise redirect the matter.

The Reviewers recognize that when executives within the System office heard that Impacted Party 1 had reported the harassment to General Counsel, they might have assumed that the General Counsel would know the correct policy and the appropriate steps to take by virtue of her position as General Counsel for the System. It is not uncommon that when others know that a member of counsel's office has been apprised, they assume that counsel has all appropriate knowledge and then defer to counsel in the handling of that situation. However, the CSCU policy is clear that individuals must report to the Title IX Coordinator their knowledge of any report of sexual harassment or sexual misconduct. The policy does not stipulate that a report to General Counsel will suffice to fulfill that obligation. Further, since the policy states that "lawyers" may be confidential employees, this has created confusion as some may have assumed that General Counsel was being consulted in her confidential attorney role. Assuming that a report to counsel would suffice is further evidence of the lack of understanding individuals within the System office have of not only the role of the Title IX Coordinator, but the purpose of mandated reporters making reports to the Title IX Coordinator - to provide the complainant and respondent with all of the protections and rights to which they are owed under policy.

Recommendations

- That CSCU policy be changed to reflect that General Counsel, those who work in the General Counsel's office, and all Board members are required to report to the Systemwide Title IX Coordinator if they witness or have knowledge of sexual harassment or sexual misconduct by any employee, Board member, third-party or student affiliated with the CSCU system.

- The Systemwide Title IX Coordinator provide in-person training for all executive leadership and Board members regarding their reporting obligations, including when and how to make a report of sexual harassment and sexual misconduct, along with instruction on what to say and not say to reporting parties, so as to avoid making victim-blaming statements, and correctly explain expectations around confidentiality and privacy.

B. Whether the response afforded appropriate protection and support to affected individuals

The inquiry found that the initial institutional response outlined in the Chronology did not provide appropriate protection and support to individuals affected by the former Interim Chancellor's conduct.

While the question of CSCU's response has focused on the response to the April 13, 2026, report, it is important to note that there were additional issues of concern that were raised, albeit informally, about Maduko's behavior in prior years. No documented responses to these concerns were provided to the Reviewers, reflecting missed opportunities to document and address past misconduct, identify patterns or systemic issues, and to prevent future harm.

The System's Response to the April 13, 2026, Report

On April 13, 2026, a CSCU employee reported sexual harassment by Maduko to multiple members of the CSCU Executive Staff. However, no one in the CSCU Executive Staff who received an initial report, including the General Counsel, the Vice Chancellor, the Executive Director, and later the AVC of HR, followed their obligation to share the report with the Systemwide Title IX Coordinator, as required by CSCU policy. While all involved, including Impacted Party 1, appear to have operated under a mistaken understanding that reporting to the General Counsel was sufficient, this is not the same as making a report to the only individual authorized under the 2020 Title IX Regulations to ensure the implementation of appropriate response protocols, including supportive measures. Further, for those who believed that a report of sexual harassment made to General Counsel could be kept confidential, the Policy is clear that only certain categories of employees can offer confidentiality, and the position of General Counsel is not among them. General Counsel was not in an attorney-client

relationship with the individual employee making the disclosure, and thus, each of the individuals who received this report, including the General Counsel, was supposed to immediately inform the Systemwide Title IX Coordinator of the report.

Because all of the individuals required to share the April 13, 2026, report of sexual harassment to the Systemwide Title IX Coordinator failed to do so, Impacted Party 1 was not timely informed of her rights nor offered supportive measures or resources, and no one conducted an appropriate intake interview to assess for the appropriate policy and the procedures that would then apply.

Delayed and Insufficient Supportive Measures: It was not until Saturday, April 18, 2026, five days after Impacted Party 1 made her report, that there was a discussion regarding implementing measures for Impacted Party 1. It was not until Monday, April 20, 2026, that supportive measures actually began to be implemented. It is important to note that although the then-Board Chair and Vice Chair and General Counsel discussed the supportive measures to be offered, the measures were insufficient to address the concerns raised by Impacted Party 1. Further, Impacted Party 1 was not offered information regarding other resources available to her related to her experiences.

Policy 4-13 provides that the "Title IX/Equity Coordinator will offer and implement appropriate and reasonable supportive measures to individuals in response to reports of alleged discrimination, harassment, and/or retaliation." In relevant part, these measures are "non-disciplinary, non-punitive individualized services offered as appropriate and reasonably available" and the goal is "to restore or preserve access to CSCU's education program or activity" through actions that can protect the safety of all individuals and the environment and deter harassment or retaliation.

Impacted Party 1 was not provided information about supportive measures, nor was she given an opportunity to learn more about the array of supportive measures that could have been made available to her. She also was not informed of her right to have an advisor, who could be anyone (a friend or attorney, for example) present when she had any meetings or interviews related to her complaint. General Counsel, assuming the Systemwide Title IX Coordinator's role, implemented a no-contact directive without considering the scope of Impacted Party 1's duties, making the vague no-contact directive insufficient to protect Impacted Party 1. Impacted Party 1 was also not

provided a formal structure for avoiding in-person contact with Maduko when he returned from his off-campus work, nor offered any protection from Maduko's ability to continue to contact her by phone, email, text, or other communication apps regardless of his location. As a result, sufficient supportive measures were neither offered nor put in place while the response to this matter was pending; and, as a result, she continued to receive offensive sexual messages from him and experience ongoing fear that would continue his sexual and inappropriate communications. Maduko, too, did not receive outreach from the Systemwide Title IX Coordinator about his rights under the process, nor was he provided adequate guidance about the scope of the no-contact directive and how to avoid interacting with Impacted Party 1.

Failure to Properly Assess the Report Under Appropriate CSCU Policy: The failure to properly assess the allegations under the appropriate policy meant that General Counsel and the then-Board Chair and Vice Chair were making decisions outside of the proper steps required by CSCU policy and process for handling complaints of sexual harassment under both the 2020 Title IX regulations and CSCU policy. Thus, the steps they followed, and investigation process they set in motion did not include the rights and protections accorded individuals who are a party to an investigation of sexual harassment under CSCU policy, nor did they take into account any changes in process that may be required for an agency head.

While CSCU has neither a written policy nor process setting forth the expected steps upon being informed of a report, both the 2020 Title IX regulations and national best practices are clear that the following steps are expected: (1) the Title IX Coordinator, or their designee, would reach out to the complainant to offer information about their rights, available resources, and options for resolution; (2) this outreach communication would include information on how to file a Formal Complaint, explain that supportive measures are available whether or not a Formal Complaint is filed, and include a copy of (or link to) the relevant policy and processes; and (3) the Title IX Coordinator would offer to meet with the complainant, along with their advisor should the complainant choose to have one with them. This communication did not occur.

The Interim CSCU Resolution Process Procedure for BOR Policy 4-13 Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy ("the Procedures") states that CSCU will evaluate a report of a potential Policy violation brought by a

Complainant or the Title IX Coordinator. This initial review is meant to determine if the alleged conduct falls within Policy 4-13. Unfortunately, the policy language suggests that anyone acting on behalf of CSCU could fulfill that requirement and thus General Counsel may have mistakenly believed she had the right to conduct such a review. However, both the 2020 Title IX regulations and national best practices dictate that it is the Title IX Coordinator, or their official designee, who should be charged with this obligation. Here, the Systemwide Title IX Coordinator was unable to fulfill this threshold task because the Impacted Party and the employees who heard her report did not disclose that information to the Systemwide Title IX Coordinator, as required.

Likewise, because of this failure of reporting, the Systemwide Title IX Coordinator was unable to provide a compliant written Notice of Allegations to the parties. If Impacted Party 1 had received that document, she would have been made aware of the allegations, the procedures, her rights, the availability of supportive measures, and the prohibition on retaliation, among other critical pieces of information that must be included in a Notice letter. Likewise, the Respondent in this matter did not promptly receive notice of the allegations, information about his rights under the process and the prohibition of retaliation, and all of the other pieces of information which are required by federal regulations, case law, and CSCU procedures.

Instead, the parties received a series of emails, before the Amended (and corrected) Notice of Allegations was issued, that failed to adequately notify them of the nature of the charges under review, their rights (including the right to an advisor), the prohibition on retaliation, or how to comport themselves at work in a manner that would ensure Impacted Party 1's safety and well-being. First, General Counsel emailed a letter to Maduko on April 20 informing him generally that he was charged with violating CSCU policies and that he should "refrain" from engaging in conduct that could be considered retaliation. The letter did not identify what he was accused of nor who had made the accusation, thus providing him with no specific instruction. During her interviews with the Reviewers, Impacted Party 1 stated that General Counsel told her a no-contact directive was in place, but that directive was not written down and the terms, if any, were not clear. Impacted Party 1 stated General Counsel also agreed to facilitate any communication between her and Maduko; Impacted Party 1 explained such an arrangement was unworkable given her position, which required frequent communication with Maduko. Then, on April 22, General Counsel emailed Maduko a

letter telling him not to report to work on April 23 and to “to continue to refrain from any contact in any form with the Complainant.” The letter did not indicate Complainant’s name, and it is unclear how Maduko would have known her identity based only on this correspondence. Finally, on April 23, General Counsel informed Maduko in more detail about the nature of the allegations and investigation, without citing any specific policy or process that would govern the investigation. Further, as noted above, none of these communications indicating the need for Impacted Party 1 to file with CHRO, nor any impediment to CSCU’s being able to investigate on its own.

C. Whether the response included appropriate notice, transparency, and accountability measures consistent with obligations to the Board and internal and external stakeholders

As summarized above, the initial response did not include the appropriate notice or transparency and accountability measures required under either the Policy, federal law, or best practices. Once the matter was brought to the Systemwide Title IX Coordinator, however, the complaint was generally handled in a manner consistent with the Policy. Maduko was put on a leave of absence, Impacted Party 1 was able to meet with the Systemwide Title IX Coordinator, and she received an explanation (albeit incomplete) of the process. The Systemwide Title IX Coordinator addressed the deficiencies in the initial response by offering supportive measures and reissuing a Policy-compliant Notice of Allegations. Additionally, both parties were notified that the Systemwide Title IX Coordinator had reviewed the matter and determined that the formal complaint would be discretionarily dismissed because of the Interim Chancellor’s resignation. Both parties also had the opportunity to submit an appeal of the dismissal under the Policy. As noted above, however, Impacted Party 1 believed appealing the dismissal would be futile, as the stated rationale for the dismissal – Maduko’s resignation – would not change even if the matter was reopened for investigation.

While a full investigation under Policy 4-13 could have yielded more comprehensive information about Impacted Party 1’s needs, appropriate remedies, and tailored prevention, the Reviewers recognize that CSCU’s position is that the only potential avenue for an investigation of an agency head (such as a Chancellor) is through the CHRO process. The Systemwide Title IX Coordinator’s communications and dismissal

notices lacked information about this requirement. This requirement, and any supplemental information about the process, was not included in the amended notice of investigation, dismissal notice or other communications to the parties. The parties did not receive information about how that process works, including how supportive measures would be offered or implemented, the rights of the parties (that would normally exist as part of Policy 4-13), and how remedies would be effectuated. Including this information would have promoted greater transparency about the next steps in the process; indeed, some of the Impacted Parties did not appear to realize that they needed to file with CHRO, or that the CHRO process was at all related to CSCU's process. This is a critical issue discovered by the Reviewers: CSCU believed that the Impacted Parties knew CSCU could not investigate, leading some of them to file with CHRO. In their view, the CHRO filing is evidence the Impacted Parties understood that CSCU would not investigate. But in our interviews with two of the Impacted Parties and their advisors, the Impacted Parties made clear that they did not know that CSCU would not investigate. They were unaware that CSCU considered the CHRO process their exclusive path for a remedy.

Further, given the writings (which included references to this review as an "investigation") and verbal conversations from the Systemwide Title IX Coordinator, Impacted Parties 2 and 4 reasonably believed that they could choose to have CSCU conduct an investigation either on its own or in parallel. If a parallel investigation is not permitted due to state law, that information should have been communicated to the Impacted Parties. Both Impacted Parties 2 and 4, along with their advisors, were surprised to learn that this Review was not an internal investigation that would lead to a determination on the facts.

D. Whether any systemic conditions may have contributed to or failed to prevent the underlying conduct and any gaps, deficiencies, or areas where the response fell short of applicable standards

This inquiry has identified the following systemic conditions that may have contributed to or failed to prevent the underlying conduct.

- Some individuals may not have escalated reports of the interim Chancellor's prior alleged misconduct for various reasons, including:

- they did not think the conduct was significant enough to warrant a response;
- they worried about retaliation given Maduko's position, status, and perceived reputation;
- they thought Title IX only applied to students;
- they had a concern that any report made would not remain private;
- they did not know where and to whom to make a report; and,
- a System office culture of preferring to resolve concerns only with trusted individuals and allies, and to not entrust others with the resolution of a concern.

This inquiry has identified multiple gaps and deficiencies that contributed to the deficiencies in response identified above:

- Overall lack of understanding of reporting requirements by some senior leadership. Some senior leadership appeared unaware of the proper approach under the law and policy to report and respond to the alleged conduct.
 - Some senior leadership did not know or did not believe that the Policy's mandated reporting requirements applied to them.
 - Some senior leadership appeared unaware of the scope of Title IX and the Policy, including that it covered non-student employees.
- Overall lack of understanding and awareness of the role and authority of the Systemwide Title IX Coordinator in responding to and handling reports of sexual harassment for all members of the CSCU community.
- A lack of agreement on the part of senior leadership and Board members as to the reporting obligations of Board members.
 - As volunteers, some believed that Board members were not bound by mandatory reporting requirements under the policy, while others believed that Board members had reporting responsibilities.

Unfortunately, this lack of clarity resulted in Board members not having been adequately trained on Title IX or on proper response protocols.
- Until the establishment of the existing Office of Compliance in 2025, there was an overall lack of regular training on sexual harassment, how to report, the role of the Systemwide Title IX Coordinator (including that reports should only go to the Title IX Coordinator), the availability of supportive measures, and the

importance of privacy in reporting, so that those who learn of someone else's report do not risk spreading information beyond those who have a need to know. Prior to the establishment of the existing Office of Compliance, the System appears to have operated from a "Check the box" mentality in allowing individuals to start jobs in CSCU without taking any sexual harassment training if they had previously received any training at a previous institution or agency, without any consideration as to whether or not those employees were equipped with the necessary skills and knowledge when joining CSCU.

Previously Reported Misconduct

Impacted Party 2 raised concerns on multiple occasions of sex-based pay discrimination to Maduko, former Chancellor Cheng, and an administrator in Labor Relations. Specifically, she raised concerns that she and other women were not being paid commensurate with their responsibilities. These complaints do not appear to have been understood as being a report of a potential policy violation, were never investigated, and do not appear to have been logged into any appropriate database. Another individual interviewed stated that the Office of Diversity, Equity & Inclusion for CT State had received reports that Maduko had engaged in inappropriate behavior, which may have included inappropriate conduct directed at women, as well as conduct that has been described as "bullying," "yelling," and "aggression." However, there are no such reports in the CT State Office of Diversity, Equity & Inclusion database; even if the bullying or yelling was not related to a protected class and thus not within the jurisdiction of that office, the complaints should have been logged, along with a notation that they were being referred to the appropriate office. Although one former administrator has stated that any such reports were forwarded to the Office of the General Counsel for the CSCU System, no such reports were found during a search of the former administrator's email account.

These poor record-keeping and information-sharing practices directly contributed to Maduko's hiring as interim Chancellor. Because some of these earlier reports or concerns were not recorded at either the campus-level or System level, they were not passed to the Board members charged with vetting Maduko. It appears that the only report the then-Board Chair and Vice Chair may have received from General Counsel

involved the message from Maduko to Impacted Party 3. It is unknown whether that information was considered by members of the Board who had a responsibility for the vetting process.

E. Specific, actionable recommendations for further institutional response, policy revision, training, or procedural reform

Develop a Protocol for the Handling of Reports Involving a Chancellor

Given CSCU's position that any reports of sexual harassment by or against a Chancellor/agency head can only be investigated and remedied through the CHRO process, it is strongly recommended that CSCU work with their attorneys, the Office of the Attorney General, and CHRO to develop a specific protocol that takes into account federal preemption principles, the need to provide parties their Title IX rights if any allegations involve Title IX-covered misconduct, and the need to ensure that remedies enable CSCU to meet its federal obligations of ending harassment, preventing its recurrence, and restoring access to programs and activities. The protocol should address whether this CHRO referral or involvement is triggered even in the case of the applicable official's resignation, when, ostensibly, they are no longer the agency head. To the extent that CSCU determines that all cases brought by or against an individual in one of these named roles must be dismissed from any CSCU process, policy language should be adjusted to make clear it is a mandatory, not discretionary, dismissal. Further, outreach templates and dismissal letters should include a clear explanation of the CHRO protocol. Without this clarity, complainants are unable to fully understand their rights and the need to file a CHRO complaint if they are seeking resolution, and administrators risk providing inaccurate and inconsistent information to parties and to key community stakeholders.

Further Investigation Is Recommended

We recognize CSCU's position that any allegations of sexual harassment against a Chancellor can only be investigated and remedied through the CHRO process, it is not clear that this premise precludes CSCU from utilizing its Title IX processes. As noted

above, CSCU should work with its attorneys and the Connecticut Office of the Attorney General to make these determinations.

The CHRO process differs from an internal investigation in key ways. First, and most importantly, the adversarial nature of the CHRO process places a burden upon a complainant that does not exist with an internal Title IX process. Unlike a Title IX process, the CHRO process requires that complainant must demonstrate harm and support their allegations with evidence. Title IX prohibits institutions from placing any burden on either party. According to the 2020 regulations, “The Department declines to place the burden of proof on respondents to prove non-responsibility because the purpose of Title IX is to ensure that the recipient, not the parties, bears responsibility to draw accurate conclusions about whether sexual harassment has occurred in the recipient’s education program or activity. Title IX obligates recipients, not individual students or employees, to operate education programs or activities free from sex discrimination, so it is the recipient’s burden to gather relevant evidence and carry the burden of proof.” (p. 30261). Second, the CHRO process requires that a complainant actively participate in every step of the process; a campus-based investigation does not have this requirement, as the burden is on the institution to gather facts, determine whether its policies were violated, and whether any remedial or preventive steps are required Third, the CHRO process requires a public hearing, something prohibited by Title IX; in fact, in the Title IX process, those who do not have a role are not permitted to attend, as this can increase the harm to victims and has been shown to reduce willingness of future complainants to make a report and/or participate in the resolution process. Further, it is not clear that the CHRO process is trauma-informed, and/or conducted by those specifically trained in trauma-informed techniques. Finally, the CHRO process is not held to the same deadlines as an internal Title IX resolution process; while there are some approximate timeframes included in the CHRO process, it is the Reviewers’ understanding that many investigations take considerably longer, with investigations running a median delay of 150 days past statutory deadlines (according to a recent audit²), rather than the shorter period as set forth in CSCU’s policies.

² <https://www.ctinsider.com/news/article/ct-audit-chro-commission-human-rights-opportunity-22196178.php>

Both Impacted Parties 1 and 4 indicated to the Reviewers that they wanted a CSCU investigation, with one Impacted Party noting that the lack of any findings would allow Maduko to publicly state that he was never “found” to have engaged in harassment, and the other noting she feels that the lack of a full investigation is a form of silencing her, without allowing her to fully share her experience. Further, according to Impacted Party 4 and her advisor, their discussion with the Systemwide Title IX Coordinator and subsequent emails led each to believe that this Review would be broader in scope so as to include an investigation into her concerns, and would be making findings regarding whether or not Maduko engaged in sexual harassment.

The Reviewers were provided with the CHRO complaint filed by Impacted Party 4, and the Reviewers further understand that Impacted Party 1 has also filed a CHRO complaint, though the Reviewers were not made aware of or provided with Impacted Party 1’s CHRO complaint by CSCU. While these filings indicate that the Impacted Parties were willing to engage in the CHRO process, these filings do not demonstrate that the Impacted Parties did not also want CSCU to conduct an investigation. Impacted Party 4 had already filed a CHRO complaint and yet specifically wanted a CSCU investigation when she met with the Systemwide Coordinator on May 26, 2026. She said that, during her meeting with the Systemwide Title IX Coordinator, the Systemwide Title IX Coordinator led her to believe that this independent review, conducted by the Reviewers was an investigation that would lead to a determination supporting her claim, and as a result she stated that she did believe at that time that this Review was going to investigate the conduct of Dr. Maduko. Her understanding was supported by the May 27, 2026, email from the Systemwide Title IX Coordinator, in which he stated that the outside firm (these Reviewers) would look at all known facts related to Maduko’s conduct. Impacted Party 4’s attorney, who attended that same meeting, also confirmed that she understood from the Systemwide Title IX Coordinator that this Review was an investigation that would result in a determination, and they were “distressed” to learn we were not.

The Reviewers also note that Impacted Party 2 has not been informed by CSCU that she cannot receive any remedies unless she files a complaint with CHRO.

Additionally, as detailed above, Impacted Party 2 believed Maduko's decision not to renew her interim contract in January 2026 was connected to a report she made about his misconduct. It is possible that one or more current CSCU employees may have accessed and provided Maduko with this confidential report and/or encouraged him to act on it and decline to renew Impacted Party 2's contract. It is advised CSCU conduct an investigation into this retaliation claim to determine if any current employees may have played a role in convincing Maduko to terminate Impacted Party 2 in retaliation for her report about Maduko's conduct. Should any current employees be identified as a respondent, appropriate supportive measures for Impacted Party 2 could include a no-contact directive between Impacted Party 2 and those employees, as well as ensuring that any future decisions about Impacted Party 2's employment be scrutinized by a neutral party.

Recommended training about sexual harassment prevention and response and reporting obligations

The Reviewers strongly recommend consistently training Board members and senior leadership, in addition to all employees (and students), on Policy 4-13, highlighting the mandatory reporting obligations and consequences for failing to report. Those trainings must clarify that reporting obligations extend to Board members and ensure that counsel and other senior leadership understand the scope and applicability of Title IX, including that it covers employee matters and with the exception of those employees the system identifies as "confidential" requires all employees to report. This training should also include information about bystander intervention and protections for parties and witnesses from retaliation.

The Reviewers learned that the existing training is considered by many to be perfunctory, misleading, and does not address challenging real-life examples, like if an employee may need to report misconduct by a supervisor. Training should identify what a mandatory reporter should say, and what they should not say, to the reporting party when receiving a report. In contrast to past training, which "encouraged" employees not to draw conclusions about a report, the training should be clear that an employee may not conduct their own investigation into allegations, second-guess or interrogate the reporting party, or decline to report to the Title IX Coordinator.

Any training should include scenarios addressing the scope of the process, such as reinforcing that the same policy applies to a part-time hourly employee as to the chief executive, and reinforce that all employees are bound by the same process. The training should also provide examples of the kind of conduct that could be considered sexual harassment. One person interviewed suggested some of the misconduct at issue was “too benign” or “just a joke” and therefore not reportable.

Training must clarify the wide scope of the prohibition against sexual harassment and that employees must report possible misconduct to the Title IX Coordinator even if they are not sure the conduct meets the policy definition. The training must be clear that employees must not make a determination about whether the conduct violates the policy, but to channel those reports to the Title IX Coordinator for their review. To that end, the training must clearly define the scope of the reporting obligation, and when and where it applies. Ensure that the limited exceptions to employee reporting obligations are understood. For example, a CSCU attorney provides legal advice to CSCU, not to any particular individual. Counsel is not exempt from the employee reporting obligation under the Policy, and while suggested revisions below will make that clearer, this understanding should be reiterated during training.

Policy Revision and Overview of the Policy Landscape Addressing Nondiscrimination and Antiharassment

The following relevant policies addressing sexual harassment were reviewed as part of this inquiry:

- Board Policy 4-13, Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy, dated 2024;
- Interim Connecticut State Colleges and Universities Resolution Process Procedure for Title IX Sexual Harassment, dated 2025;
- Interim Connecticut State Colleges and Universities Resolution Process Procedure for BOR Policy 4-13 Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy, dated 2025; and
- Board Policy 4.08 HR Policies for Management/Conf/Professional Personnel.

CSCU's policy landscape for nondiscrimination and antiharassment includes Board Policy 4-13, Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy (the "Nondiscrimination Policy"), and its two associated procedures: Interim Connecticut State Colleges and Universities Resolution Process Procedure for Title IX Sexual Harassment ("Title IX Procedure") and Interim Connecticut State Colleges and Universities Resolution Process Procedure For BOR Policy 4-13 Interim Discriminatory Harassment, Nondiscrimination, and Title IX Policy ("Non-Title IX Procedures").

The Nondiscrimination Policy has a comprehensive scope and applicability. It applies to "all faculty, staff, employees, students . . . and other individuals participating in or attempting to participate in the CSCU's education programs and activities, including but not limited to contractors, vendors, visitors, guests, or other third parties." The Policy states clearly that it applies to conduct on- and off-campus, including conduct that takes place online, through electronic communication, and through social media. The Policy prohibits discrimination (both different treatment and disparate impact) and discriminatory harassment on all protected categories. It also prohibits sex-based harassment, dating violence, domestic violence, stalking, sexual exploitation, unauthorized disclosure, and retaliation. The two procedures are distinct only because one is used to investigate and adjudicate Title IX sexual harassment and the other is used for all other conduct prohibited by the Nondiscrimination Policy. The same policy and procedures are used for matters involving students as matters involving employees.

The Nondiscrimination Policy does not include specific references to the two procedures. Each procedure references the Nondiscrimination Policy by name but does not include a link. Confusingly, the Non-Title IX Procedure references the Title IX Procedure and includes a link, stating that it "will apply to any potential violations that could constitute Title IX Sexual Harassment that are alleged to have occurred after August 13, 2020." But Title IX Sexual Harassment is not defined in the Policy or in the Non-Title IX Procedures—it is only defined in the Title IX Procedures. Interested parties would need to at least skim all three documents to try to determine which procedure applies to their situation.

The Reviewers recommend that related documents include crosswalks between each other so that users can easily navigate to the appropriate document. Each document should also plainly state its purpose. Specifically, the Nondiscrimination Policy should

include the names and titles of the applicable procedures along with web links to navigate to or download those procedures. The Policy should also describe the circumstances under which each procedure is used. Otherwise, the users need to read not only the Policy but also the Title IX Procedure to figure out which procedure applies to their situation. Each procedure should begin with an explanation that it is the procedure for specific types of prohibited conduct under the Nondiscrimination Policy, and should include a list of the exact prohibited conduct and include a link back to the Nondiscrimination Policy and to the other procedure used for the remaining prohibited conduct.

Employee Reporting Obligations

The Mandated Reporting and Confidential Employees section of the Nondiscrimination Policy requires reworking. First, the Reviewers recommend updating the title of this section to "Employee Reporting Obligations." This updated title is more descriptive and avoids the phrase "mandated reporting," which is a term of art that typically refers to those who are obligated to report suspected or known child abuse or neglect to state or local authorities. Because conduct reported under this Policy could involve minors and implicate the mandatory reporting process, the Policy should include a cross-reference to Board Policy 5-06, Reporting Suspected Abuse or Neglect of a Child. The obligation is important enough to put in the main text instead of its current location, in footnote 10.

Next, this section should be clearer on who must report any known potential violations of the policy, and which violations trigger required reporting. Currently the language identifies all employees, including student-employees, as required to report "all known details of actual or suspected discrimination, harassment, and/or retaliation." Are Board Members considered employees for the purposes of this section? Are there Board policies obligating Board Members to follow employee policies such as these? Consider also whether contractors who are acting as agents of CSCU should also be included as required to report. The second paragraph of this section may be intended to warn potential complainants that the information they share with someone who has a reporting obligation will be shared with the Title IX Coordinator. But the phrasing is such that it seems as if disclosing to a "mandated reporter" is the same as requesting formal action. This paragraph can be revised to assure individuals considering

disclosure that aside from this reporting obligation, employees will, to the fullest extent possible, maintain the privacy of an individual's information.

Confidential Resources

The section on Confidential Employees should also be revised. First, consider renaming the section, Confidential Resources. As written, it seems as though certain individuals are confidential regardless of the context of a disclosure. For example, a faculty member who happens to be a licensed therapist is not a "confidential employee" while talking with students and colleagues. Additionally, the definition provided in the Policy includes lawyers, although lawyers are not included in the Policy's list of confidential employees. Generally, a person can make a confidential disclosure to their own lawyer when there is an attorney-client relationship between the disclosing party and the attorney.

For clarity, CSCU should remove in its entirety the definition of "confidential employee" found in the Policy. The definition seems to be holdover from the now-vacated 2024 Title IX regulations. The Reviewers suggest that the definition be removed and instead CSCU describe available confidential resources for students, and then separately, for employees. Because the Policy is System-wide, CSCU may want to state that the System and each campus have various confidential resources available for students and employees, which can be found on each institution's and the System's Title IX website. Or CSCU can list known campus counseling information, state-wide off-campus resources, and EAP for employees, if applicable, and state that additional confidential resources may be available on your campus.

Prohibited Conduct in the Nondiscrimination Policy

The Nondiscrimination Policy's sex-based harassment definition includes subsections for hostile environment sexual harassment (severe or pervasive), quid pro quo sexual harassment, and sexual assault. The Policy's definition of "sex-based harassment" covers a broader scope of conduct than "Title IX sexual harassment," which prohibits sex-based unwelcome conduct that is severe, pervasive, and objectively offensive. The Policy also lacks Title IX's jurisdictional limitations concerning where the alleged conduct occurred. Meanwhile, the Title IX Procedure begins with a definition of Title IX sexual harassment that is compliant with the 2020 regulations, along with the accordant jurisdictional limitations. This means that currently, two types of prohibited

conduct are found only in the Title IX Procedures—for clarity, this Review will refer to these violations as Title IX quid pro quo harassment and Title IX hostile environment harassment.

The Reviewers recommend that CSCU expand the Prohibited Conduct section of the Nondiscrimination Policy to include all the potential policy violations, including Title IX quid pro quo harassment and Title IX hostile environment harassment. An example of how to list Title IX prohibited conduct including the jurisdictional limitations in the Nondiscrimination Policy is included as an addendum to this report.

The Reviewers further recommend that CSCU adjust the definition of sex offense to conform with the June 2025 national Incident-Based Reporting System (NIBRS) User Manual, as this change has impacted the definition of sexual assault in the 2020 Title IX regulations.

Additionally, CSCU should reorganize the definitions of prohibited conduct in the Nondiscrimination Policy so that domestic violence, dating violence, sexual assault, and stalking (the “VAWA crimes”) are either all components of “sex-based harassment” along with quid pro quo and hostile environment, or instead all separately listed from sex-based harassment. Currently, the Policy only includes sexual assault as a subsection of sex-based harassment. This choice is confusing because it is inconsistent with current regulations and the previous (and vacated) Title IX regulations, which both include the VAWA crimes (sexual assault, domestic violence, dating violence, and stalking) as subsections of sexual harassment. Additionally, GRS recommends updating the definition of Rape to encompass both Sodomy and Sexual Assault with an Object. This change was made several years ago and is also reflected in the most recently issued NIBRS User Manual from the FBI. The definitions for Sodomy and Sexual Assault with an Object can be removed, and the definition of Rape can be replaced. An example of how to define Sexual Assault as per the Title IX regulations is included in the addendum to this report.

Nondiscrimination Policy Definitions

The Reviewers recommend that CSCU update the definition of Supportive Measures in the Nondiscrimination Policy to clarify that such measures are available whether or not a formal complaint is filed. A more fulsome definition of Supportive Measures is offered in the addendum, along with additional definitions CSCU could consider adding.

Some of these definitions are intended to streamline and give clarity for the Nondiscrimination Policy and its procedures; for example, the Policy references advisors but does not explain who those advisors might be or what they might do in their role. And by defining “days,” the procedures need not repeat the phrase “business days.” By defining “notice,” it is known that all notices are in writing, and how such notice is accomplished. Currently “formal complaint” is only defined in the Title IX Procedures, while “report” and “complaint” are defined in the Nondiscrimination Policy—adding “formal complaint” to the Policy gives a more complete picture of the options available to policy users. CSCU should also consider moving the definition of “student” to the definitions section instead of footnote three.

Adding Specificity to the Procedures

Both Procedures should be updated to add specificity. The law permits CSCU to use titles rather than names, and this practice makes even more sense in systemwide policies and procedures. However, the policies need to use correct titles. For example, the procedures say that “CSCU” will take certain actions that should only be taken by the Title IX Coordinator or designee. Determining the sufficiency of supportive measure, reviewing reports for sufficiency and neutrality, dismissing complaints, and determining the correct method of resolution are tasks that can be performed only by the designated Title IX Coordinator. Yet these and other tasks, such as assigning investigators, conducting investigations, and coordinating emergency removals are assigned vaguely in the procedures to “CSCU.” A simple statement in the Policy or the Procedures can clarify that obligations in the policy assigned to a particular title, such as the Title IX Coordinator, may be designated as appropriate by the Coordinator, including to external professionals. This can also help to avoid the risk that another administrator would believe they have the authority to take any of these actions on behalf of CSCU.

Other areas requiring specificity are the emergency removal sections of both procedures. Neither procedure includes how to challenge an emergency removal, the timeframe for the challenge, the decisionmaker or reviewer for the challenge, or the timeframe to make a determination on the challenge. CSCU should review all stated timeframes in the procedures to check for reasonableness and appropriateness.

Revising Informal Resolution Process

Each procedure includes a section on informal resolution, but neither requires the Title IX Coordinator's approval in the process. Consistent with best practices, informal resolution should only be available to the parties if they mutually agree in writing and if the Title IX Coordinator approves the use of informal resolution. Even where the law permits informal resolution, the Title IX Coordinator might determine, based on the facts, that it is not an appropriate resolution method. Similarly, the procedure should be clear that the Title IX Coordinator can determine that the parties must withdraw from the informal resolution process and revert to the investigatory process, as applicable. Finally, the Title IX Coordinator should sign off on the parties' agreed upon outcome of the informal resolution process before it becomes final and binding.

Reporting and Response Processes

The Reviewers recommend that the reporting and complaint process is fleshed out to describe how and when the Title IX Coordinator might proceed with response to a report without a complainant's involvement. The Non-Title IX Procedure says that the Title IX Coordinator can "make a complaint," and the Title IX Procedure says that a Formal Complaint can be signed by the Title IX Coordinator. But neither procedure describes the circumstances in which the Coordinator might seek to move forward with a complaint either without a known complainant or against the complainant's wishes. The Policy says that "in most situations, CSCU may be able to respect a Complainant's request to not initiate the Resolution Process. However, there may be circumstances, such as pattern behavior, allegations of severe misconduct, or a compelling threat to health and/or safety, where CSCU may need to initiate the Resolution Process." This information about how a resolution process might begin is important for both procedures but is only found in the Policy. CSCU should revise the Policy to comprehensively cover the reporting and complaint processes or defer information about those processes to the procedures completely.

As written, the reporting options and initial intake and assessment processes are not clear in the Policy or its procedures. Section V. of the Non-Title IX Procedure describes the initial review, or how CSCU evaluates a report to determine whether it falls under the Policy. Ideally CSCU would use this initial review process for all reports and can also assess at that time whether Title IX Prohibited Conduct is implicated, necessitating a

formal complaint. CSCU can either include reporting, initial outreach, intake, and assessment in the Nondiscrimination Policy, or can repeat those sections and processes nearly identically in each procedure. This method allows CSCU to plainly state that all reports are encouraged, and once a report is received, CSCU can conduct initial outreach to reporting parties to offer information about next steps and supportive measures. If reported alleged conduct could constitute Title IX Prohibited Conduct, then the reporting party would be notified about the formal complaint process. If the reported alleged conduct could constitute other, non-Title IX prohibited conduct, then the matter would proceed to the Non-Title IX Procedures.

CSCU should respond to every report or complaint with outreach to the Complainant. This outreach should take place promptly, typically within three days of a report's receipt. Currently, the timeline for the initial review of a report by CSCU is 10 days, and it is only stated in the Non-Title IX Procedure. Ten business days is too long a time period for an initial review unless that timeframe is contemplated to encompass scheduling an intake interview and conducting the case assessment.

In the initial outreach, the Coordinator would invite the Complainant to schedule a meeting where the Coordinator could share important information about rights and options under CSCU's policies, as well as available campus and community resources for counseling, health care, mental health, and more. If the Complainant does meet with the Coordinator, the Coordinator can do an intake and assessment at that time. The intake and assessment seek to gather information about the nature and circumstances of the report to determine whether the Nondiscrimination Policy applies to the report and, if so, which procedure and which resolution process may be appropriate. The Title IX Coordinator may also determine that the provision of supportive measures only is the appropriate response under the Policy. The initial assessment is not a finding of fact or responsibility.

After the initial outreach, intake, and assessment, both procedures should move on to how a resolution process is initiated. In the Title IX Procedures, the next section would be what is currently Section VI, Filing a Formal Complaint. In the Non-Title IX Procedures, the next would be Section VI, Dismissal.

Improving Readability in the Procedures

Both procedures should be updated for readability, becoming more linear to the reporting and processing of a report and complaint. At the outset, each procedure should clearly identify the related policy, list the specific types of prohibited conduct that should proceed under the procedure, and identify the other procedure for the other prohibited conduct. For example, assuming the definition of Sex-Based Harassment is reorganized to include Dating Violence, Domestic Violence, and Stalking, the Non-Title IX Procedure would start by stating, "This procedure is used to address reports of Discrimination, Discriminatory Harassment, Quid Pro Quo Harassment (Non-Title IX), Hostile Environment Sex-Based Harassment (Non-Title IX), Sexual Exploitation, Retaliation, and Unauthorized Disclosures under Board Policy 4.13, Interim Discriminatory Harassment, Nondiscrimination, Title IX Policy. Title IX Prohibited Conduct is addressed by Interim Connecticut State Colleges and Universities Resolution Process Procedure For Title IX Sexual Harassment." The titles of the Policy and the Title IX Procedure would include hyperlinks to the respective documents. Both Procedures should also be renamed. Currently, the Non-Title IX Procedure title is long and confusing, particularly because it includes the phrase "Title IX" and it is the procedure for everything under the Policy except Title IX sexual harassment. Defining Title IX Prohibited Conduct and Non-Title IX Prohibited Conduct in the Policy could lead to simplified and ultimately more descriptive titles for the two procedures.

Next, if the Policy is not amended to flesh out the reporting and complaint process, then such information would be found in both procedures. Individuals need to know how to report, how CSCU will respond to a report, and how to seek a resolution. The section on reporting should cross-reference the employee reporting obligations set forth in the Nondiscrimination Policy.

Following information about the investigation process, each procedure should have a designated section explaining evidence review. The Non-Title IX Procedure should be updated to provide the parties a meaningful opportunity to respond to the evidence before the investigation report is finalized. Currently, the Non-Title IX Procedure has the parties providing their response to the decision-maker, which increases the likelihood that an issue about additional, new evidence will come up during the hearing. This issue is avoidable with a proper evidence review providing a response to

the investigator prior to the report's completion. Confusingly, the information about evidence review in the Non-Title IX Procedure is found in the section titled "Investigation," and in the Title IX Procedure evidence review is found under the heading "Timeline." Both procedures have a section titled "Review of Evidence," which refers to relevance and impermissibility. These headings should be revised to conform with the content of that section. An example of a more fulsome evidence review clause is in the addendum; the example is compliant with Title IX. If CSCU prefers, alterations could be made for the Non-Title Procedure, such as shortening the length of the review from 10 days to a shorter time period.

Additional headings and subheadings would increase readability and clarity for the procedures. For example, a paragraph about emergency removal in the Non-Title IX Procedure also includes a statement that CSCU will accommodate individuals with disabilities and with limited English proficiency to ensure their equal access to the procedure. Without a paragraph break or a heading, it reads as though such accommodations are only available for the emergency removal process, rather than for the other elements of the procedure. Some paragraphs under the General Provisions are critical enough to warrant their own heading, including: Advisors, Supportive Measures, Emergency Removal, Administrative Leave, Accommodations, and Privacy. If CSCU uses headings, readers can easily navigate to the section of interest using a table of contents.

Appeal Process

The appeals section of both procedures is titled "Response to Decision and Appeal Process." It is unclear why a party would submit a written response to the record that does not constitute an appeal. Allowing such a response is not a requirement and may cause confusion among parties and the institution about the purpose of a submission. Additionally, this section in both procedures should be revised to include a statement that "any party's decision not to submit a reply to an appeal is not evidence that the non-appealing party agreed with the appeal."

Add Information About Complaints Subject to CHRO Referral to the Policy and/or Procedures

As described above, CSCU must determine where a more detailed description of the reporting and complaint processes will be located: either the Policy, or in both Procedures. This new section (or sections) must also include information about complaints subject to CHRO referral by or against the Chancellor (interim, acting, temporary, or permanent), the Title IX Coordinator, or the head of Human Resources. The language in the policy should reflect the protocol developed in response to the recommendations above in Phase 2, Section D. This update would provide transparency to reporting or responding parties in matters involving one of these roles about any variations to the standard procedures that may apply to their matter.

Board Policy 4-08

The Reviewers recommend revisions to Board Policy 4-08 HR Policies for Management/Conf/Professional Personnel to better align with the Nondiscriminatory Policy and the two procedures. Policy 4-08 section 3.1 is titled “Non-discrimination, Affirmative Action & Sexual Harassment.” This brief policy reads more like a policy statement than a policy itself; it directs that “Complaints alleging discrimination and sexual harassment will be investigated according to the complaint procedures adopted at each of the constituent units or at the system office.” Section 3.1 can remain brief—there is no need to reiterate other policies—but it should be amended to more closely align with existing CSCU nondiscrimination and antiharassment policies for consistency. For example, CSCU might consider amending the language of 3.1 to include an excerpt from the “Purpose” section of Board Policy 4-13. GRS also recommends that CSCU add “crosswalks” from Board Policy 4-08 to the applicable full policies and procedures on antiharassment and nondiscrimination. Readers of the HR policies should be specifically directed to the full policies and reporting mechanisms or to a page that houses such information. The date on the HR policies is 2013; since that time, nondiscrimination and antiharassment laws and guidance have evolved. For example, there is a statement that “employees are expected to discharge their affirmative action responsibilities,” but without more information about how employees would learn about those responsibilities. While there may be state or System policies and practices related to affirmative action, the current federal administration’s approach may require CSCU to adjust this language after review. To conform with

current best practices, any messaging or documents for the campus community relating to nondiscrimination and antiharassment should include clear information about policies and procedures, how to report, and how such reports might be resolved.

Phase 3 Findings

In Phase 3, the Reviewers analyzed whether the process for appointing a permanent or interim Chancellor included sufficient due diligence to mitigate the potential for future similar occurrences. Specific recommendations for further action or reform are found herein.

The Reviewers interviewed individuals with a role in or knowledge of selection and hiring practices for interim or permanent Chancellors, including the initial screening of candidates; the adequacy of the recommendation process; the adequacy of follow-up interviews with candidates; and the thoroughness, accuracy, and career-spanning adequacy of background checks. The Reviewers also reviewed CSCU policies on chancellor appointments and similar policies from other public institutions to make recommendations below on policy improvements.

Based on information from interviewees, this inquiry found that the interim chancellor selection process for Maduko was undocumented and lacked depth. The steps taken to mitigate risk, if any, were not documented or well-understood by those involved in the process. The Reviewers also understand that work is underway to formalize a more robust interim appointment process. Specifically, the Board Vice Chair shared that another Board member was leading efforts to establish a written process for selecting an interim chancellor, and that the current search process for a permanent chancellor is “more robust than it has been in the past.”

The Reviewers recommend revising the policies on interim and permanent chancellor appointments as discussed below and consistent with the June BOR Talking Points. Formalizing a thorough, documented process with both formal and informal background checks, and then following that process, will help ensure that CSCU has done its due diligence to understand potential concerns about candidates. Such concerns can then be explored by the selection committee to determine the appropriateness of the candidacy given the available information.

Interim Chancellor Search

Current and former Board members and CSCU leaders provided varying, sometimes inconsistent accounts of the interim search process that occurred for Maduko's appointment as interim Chancellor. The Vice Chair stated that she felt the existing selection process for the interim chancellor was aligned with industry standards because the Board knew what qualifications they needed in an interim leader and knew that they wanted someone with "credibility and experience in the community." But the Vice Chair also said that the process was not documented, personnel records or performance history were not reviewed, and no background check was conducted. The Vice Chair said that she did not think General Counsel was involved in vetting the candidates. The Vice Chair said she was aware of concerns about Maduko from when he became the president of CT State, including that he was viewed as "too controlling or demanding" and "too forceful." The Vice Chair stated that these concerns were addressed when Maduko became president and were not addressed as part of the interim Chancellor vetting process.

The then-Board Chair said that the entire Board was involved in selecting Maduko, and that the Board used CV's, annual reviews, and experiential interactions that Board members had with each candidate as part of their consideration. The then-Board Chair stated he was not aware of any previous Title IX complaints about Maduko or concerns about him screaming at staff. The then-Board Chair acknowledged General Counsel's involvement with the interim chancellor search "to see if there was anything out there" about the candidates, like "any issues on the internet," but he did not know if there was any search or conversation with any of the Title IX offices.

General Counsel said she was part of the vetting process and that Title IX Offices consulted during the search would have been through her office. According to the Director of Equity and Civil Rights for CT State, General Counsel had reached out to him to find out if there were any records regarding Maduko; he informed the Reviewers that he found no records when asked to conduct the search. General Counsel also reached out to the Interim Systemwide Title IX Coordinator for CSCU and was provided information (anonymized, to protect the identities of the impacted parties) regarding the report made by Impacted Party 2 about the experience of Impacted Party 3, and then provided that information to the then-Board Chair and Vice Chair.

The current Board Chair said he was not part of any conversations about vetting, and that CSCU relied on the original background check when Maduko went to CT State. He said that others were consulted to give feedback about Maduko, including people in leadership, the Chief of Staff, General Counsel, and CT State.

One impacted party said she was asked by two unnamed Regents for her professional opinion on the candidates. She said she shared concerns about Maduko's leadership and noted that the System could not afford any further scandals, but neither Regent asked her any follow-up questions. Another impacted party stated that she informed the General Counsel that it would be “bad for the System” and for the impacted party if Maduko became interim Chancellor, but that General Counsel did not ask any follow-up questions. General Counsel stated that she did not recall the comment. General Counsel recalled asking the then-Interim Systemwide Title IX Coordinator for any information about reports naming Maduko, and shared the information received with the then-Board Chair. The head of the Office for Equity and Civil Rights Office at CT State recalled that he was asked to search office records for reports on Maduko and did not find any reports of sexual harassment or other sexual misconduct.

Current Permanent Chancellor Search

The June 2026 Talking Points for BOR Update on Chancellor Search provided by the Executive Vice Chancellor describes the recruitment and search process underway for a permanent Chancellor, which includes the distinctive features of the search. These features reflect some of the best practices that are otherwise missing from existing Board policies on chancellor appointments, described below. Unlike in the policies, the BOR Update describes the size and potential composition of the Search Advisory Committee in detail. Another distinction for the current chancellor search underway is an intensive background checks designed to look for “undisclosed ‘sins of the past’.” Documenting a policy or search protocol that incorporates these improvements will mitigate CSCU’s risk in future searches.

Board Policy 4-15 Review and Recommendations

Board Policy 4-15, Policy for the Appointment of a CSCU System Chancellor, was adopted in 2020. This Policy is generally well-aligned with best practices in higher education for the search and selection of a permanent chief executive, but as detailed below, it falls outside best practices regarding interim appointments. Policy 4-15

reflects best practices in shared governance; for example, the use of a Search Advisory Committee allows for critical constituent participation and may include internal and external individuals. Other stakeholders can participate by providing comments after meeting with finalists. The Reviewers recommend that CSCU add more details to the Policy about the makeup of the Search Advisory Committee; it reads as though those details were going to be included but were forgotten. The section on the Advisory Committee says that “[e]ach constituent group, in accordance with the representation outlined below, should select its own members to serve on this committee and the members should represent the diversity of the CSCU community.” Details about the composition of the committee is not found later on in the Policy. CSCU might consider reviewing The City University of New York’s [Policy on Chancellor Searches](#) which includes an example of how to outline a committee’s composition; their committee requires at least five Board members, two faculty members, two students, one alumnus, one community college president, and one president from what CUNY identifies as a “senior college.”

CSCU Policy 4-15 does not address required disclosures regarding conflicts of interest or past or pending misconduct; such disclosures would be helpful for those evaluating a candidate’s fitness for the appointment. It may be that requests for such disclosures take place as part of becoming an employee but are not detailed in the policy.

Evaluation is not addressed in Policy 4-15, but is covered in Policy 4-14, Policy on the Appointment and Evaluation of CSCU Chancellor. Policy 4-14 was updated in 2024, but does not include a cross-reference to Policy 4-15, even though both policies purportedly cover the appointment of the Chancellor. These policies should be revised to align and reference each other where appropriate. Renaming the policies would also provide clarity. Policy 4-14 could more appropriately be titled “Policy on the Duties of the Chancellor and Evaluation of the Chancellor.” As written, there is only one sentence in Policy 4-14 about the appointment of the Chancellor, and it says simply that “the Board . . . appoints the Chancellor . . . who serves at the pleasure of the [Board].”

Notably absent from Policies are the details about how to vet Chancellor candidates and information about emergency, temporary, or interim chancellor appointments. This

absence is surprising given the various emergency situations that could lead to a chief executive's absence or unavailability.

Succession planning is seemingly addressed in Board Policy 5-15, CSCU Leadership Continuity Policy, which mentions interim appointments only to acknowledge that in the case of an extended absence, an interim chancellor will be appointed. But the process for that appointment and the evaluation of the interim chancellor, if any, is not addressed. And Policy 5-15 lacks any cross-reference to the related policies on chancellor appointments and evaluations.

Interim or temporary appointments could be incorporated into Policy 4-15 or could be found in a separate, new policy. For example, Western Oregon University includes a section on interim and acting appointments in its policy [Executive Searches and Appointments](#). It designates which Board committee's members are consulted to recommend an interim chancellor candidate and briefly outlines the interview, evaluation, and appointment process; appointment requires a Board vote. The Universities of Wisconsin policy [Selection Process for System President, Chancellors, Vice Chancellors and UW System Senior Leadership Positions](#) also includes the selection process for interim appointees to all of those positions. There are separate sections for the interim appointment of a president, chancellor, and vice chancellor. Note that at Wisconsin, each campus has a chancellor, and the head of the system is the president.

For an example of a separate policy, consider the [Pennsylvania State System of Higher Education's Policy 1983-14-A: Appointing Interim and Acting Chief Executive Officers](#). This policy addresses acting and interim presidents and chancellors, noting that interim appointees "appointees shall be subject to the requirements of relevant employment background investigation policies." Additionally, it provides that acting or interim chief executives who serve one year or longer are subject to the same evaluation procedures as permanent executives.

The [Nevada System of Higher Education](#) requires the Chair or Vice Chair of the Board to meet with "major constituencies" for suggestions and input for temporary Chancellor appointments. Presidents, faculty senate chairs, provosts, vice presidents, faculty, staff, student leadership, foundation trustees, legislators, and community representatives included in the non-exhaustive list of potential constituencies to be

consulted. Interview questions presented to the candidate by the Board will be preapproved by the chief human resources officer before the Board meeting where the interview takes place.

The pertinent information about interim or temporary appointments to include in a policy are:

- Eligibility criteria. Are there any standard eligibility criteria to serve as an interim appointee?
- Selection and approval process. Which constituencies are involved in vetting and selecting candidates? What does that process look like?
- Vetting and disclosures. Do the candidates need to provide references? Must the candidate disclose litigation they are involved or named in, conflicts of interest, or past or pending misconduct matters? Are public records searched to determine if any of these issues could be known to the selection committee? Does the process vary depending on the expected length of the appointment or the current role of the appointee?
- Appointment process. Who approves the appointment of the finalist?
- Limitations on duration. Are there time limits to an interim or other temporary appointment?
- Exclusion from permanent search, if applicable. Does serving as the interim chancellor preclude inclusion in the candidate pool for permanent chancellor?
- Evaluation of the interim appointee.

If a potential appointee is a current CSCU leader, the Board's protocol should include requesting feedback about the candidate from other CSCU professionals, including informal feedback via interviews from colleagues, subordinates, and a representative of the academic senate, and formal feedback from performance evaluations. The Board should find out whether reports or complaints have been made about the candidate, and if so, the disposition of those reports. Efforts to obtain this information, any responses, and an assessment of the feedback should be documented by the search committee.

CSCU could either create a new policy on interim, temporary, acting, and emergency appointments, or amend existing Board policy to incorporate the process for selecting, appointing, and evaluating interim executives. The policy could be limited to interim chancellors or could be expanded to include the procedures around selecting interim presidents. Aligning to best practices as described above would mitigate risk surrounding interim and chancellor appointments and provide clarity to stakeholders about the process to select and evaluate interim leaders.

Addendum

It is recommended that the following changes be made to existing CSCU policies:

1. Define Title IX Prohibited Conduct

Below is an example of how Title IX Prohibited Conduct can be included under the Prohibited Conduct section of the Nondiscrimination Policy. By defining Title IX Prohibited Conduct, the Policy will then be more complete and will list all the conduct that is prohibited. The procedures will outline how Title IX Conduct and Non-Title IX Conduct, respectively, are investigated and adjudicated.

Title IX Prohibited Conduct

Conduct on the basis of sex that satisfies one or more of the following and meets the jurisdictional requirements described below:

- a. Title IX Quid Pro Quo Sexual Harassment. An employee or graduate student conditioning the provision of an aid, benefit, or service of the university on an individual's participation in unwelcome sexual conduct;
- b. Title IX Hostile Environment Sexual Harassment. Unwelcome conduct on the basis of sex determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the university's education program or activity.
- c. Sexual Assault, Dating Violence, Domestic Violence, and Stalking, as defined below and meeting the Title IX jurisdictional requirements described here.

Conduct meeting these definitions must occur within CSCU's education program or activity and inside the United States to constitute Title IX Prohibited Conduct. CSCU's program or activity includes (1) any on-campus premises; (2) any off-campus premises over which CSCU has substantial control; (3) off-campus activities that are part of a CSCU program, including field trips and sanctioned events; and (4) activity occurring within computer and internet networks, digital platforms, and computer hardware or software owned or operated by, or used in the operations of CSCU's programs and activities over which CSCU has substantial control.

2. Update the definition of Sexual Assault

Sexual assault includes:

Rape—The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.

Sexual Contact—the intentional, nonconsensual touching of the clothed or unclothed body parts of another person for the purpose of sexual degradation, sexual gratification, or sexual humiliation. Sexual Contact also includes the forced, nonconsensual touching by the victim of the actor's clothed or unclothed body parts for the purpose of sexual degradation, sexual gratification, or sexual humiliation. This offense includes instances where the victim is incapable of giving consent because of age or incapacity due to temporary or permanent mental or physical impairment or intoxication.

Incest—Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Statutory Rape—Sexual intercourse with a person who is under the statutory age of consent.

3. Add the following definitions to the Nondiscrimination Policy

Advisor: Each party has the right to choose and consult with an advisor of their choice at their own expense. The advisor may be any person, including a friend, family member, therapist, union representative, or an attorney. CSCU will not limit their choice of advisor. Parties in this process may be accompanied by an advisor of choice to any meeting or proceeding to which they are required or are eligible to attend. Except where explicitly stated by this policy and its applicable procedures, advisors shall not participate directly in the process. CSCU will provide the parties equal access to advisors; any restrictions on advisor participation will be applied equally.

Days: any reference to days refers to business days when CSCU is in normal operation.

Formal Complaint: A formal complaint means a written document (hard copy or electronic) that alleges that a Respondent engaged in Title IX Prohibited Conduct and requests initiation of the Title IX Procedures to investigate the allegation of the conduct. A "formal complaint" can only be filed by the Title IX Coordinator or by a complainant with a signature or other indication that the complainant is the person

filing the Formal Complaint. A formal complaint is required before investigating or engaging in informal resolution for Title IX Prohibited Conduct.

Notice: All notices under this policy are written and sent to the student or employee's assigned institutional email address; or delivered via Certified Mail to the local or permanent address(es) of the parties as indicated in official CSCU records; or personally delivered to the intended recipient.

Remedies: Remedies means measures provided, as appropriate, to a complainant or any other person CSCU identifies as having had their equal access to CSCU's education program or activity limited or denied by sex discrimination or other prohibited conduct covered by this policy. These measures are provided to restore or preserve that person's access to the education program or activity after CSCU determines that sex discrimination occurred. Only the complainant will be informed of any remedies pertaining to them. Some examples are academic support and/or opportunity to retake a class or resubmit work or time extensions on course or degree completion, or non-academic support such as counseling, or changes to work assignments or locations. The Title IX Coordinator is responsible for implementation of remedies.

Supportive Measures: Individualized measures offered as appropriate, as reasonably available, without unreasonably burdening a complainant or respondent, not for punitive or disciplinary reasons, and without fee or charge to the complainant or respondent to:

- Restore or preserve that party's access to CSCU's education program or activity, including measures that are designed to protect the safety of the parties or CSCU's educational environment; or
- Provide support during CSCU's resolution procedures or during an alternative resolution process.

Supportive measures may include but are not limited to: counseling; extensions of deadlines and other course-related adjustments; campus escort services; increased security and monitoring of certain areas of the campus; restrictions on contact applied to one or more parties; leaves of absence; changes in class, work, housing, or extracurricular or any other activity, regardless of whether there is or is not a comparable alternative; no-contact directives (which may be mutual or unilateral at the discretion of the Title IX Coordinator); and training

and education programs related to sex-based harassment. Supportive measures are non-disciplinary and non-punitive. Supportive Measures will also be offered to respondents when they are notified of the allegations.

Any Supportive Measures put in place will be kept confidential, except when doing so impairs the ability of the institution to provide the Supportive Measures.

CSCU will offer and coordinate supportive measures as appropriate for the parties as applicable to restore or preserve their access to CSCU's program or activity or provide support during CSCU's alternative resolution process or resolution procedures. Individuals covered by this policy have the right to request supportive measures from CSCU regardless of whether they desire to make a formal complaint.

A party may challenge CSCU's decision to provide, deny, modify, or terminate supportive measures when such measures are applicable to them. An impartial employee will be designated to consider modification or reversal of CSCU's decision to provide, deny, modify, or terminate supportive measures. When the individual providing Supportive Measures is a Deputy Title IX Coordinator or other individual identified by the Title IX Coordinator to provide Supportive Measures, the Title IX Coordinator will be designated to consider the challenge regarding supportive measures. The impartial employee will typically respond to the challenge within five (5) days.

The Title IX Coordinator has the discretion to implement or modify supportive measures. Violation of the parameters of supportive measures may violate existing codes or handbooks.

4. Consider this sample procedure section about evidence review

Evidence Review

At the conclusion of all fact-gathering, the investigator will provide each party and their advisor the opportunity to review all relevant and directly related evidence gathered. In the event that an audio or audiovisual recording is shared, the recording will only be made available at an in-person and monitored meeting on campus, and will not otherwise be transmitted for review, so as to maintain the privacy of those participating in the process.

The purpose of the inspection and review process is to allow each party the equal opportunity to meaningfully respond to the evidence prior to conclusion of the investigation and to submit any additional relevant evidence, questions for parties or

witnesses, or the names of any additional witnesses with relevant information. This is the final opportunity to offer evidence or names of witnesses. Evidence not provided during the investigation process will not be considered by the Hearing Officer. Given the sensitive nature of the information provided, CSCU will facilitate this review in a secure manner. None of the parties nor their advisors may copy, remove, photograph, print, image, videotape, record, or in any manner otherwise duplicate or remove the information provided. Any student or employee who fails to abide by this may be subject to discipline. Any advisor who fails to abide by this may be subject to discipline and/or may be excluded from further participation in the process.

The parties will have a minimum of 10 days to inspect and review the evidence and submit a written response in writing to the investigator. The Title IX Coordinator shall have the discretion to extend the evidence review period based on the volume and nature of the evidence.

When deemed appropriate by the investigator, the investigator shall then conduct any additional fact-gathering as may be necessary. If new, relevant evidence was submitted as part of evidence review, or is gathered during this second fact-gathering period, the new relevant evidence will be made available for review by the parties and their advisors. The parties shall have 5 days to provide a response to the newly gathered evidence. No new evidence will be accepted as part of any response, except that the investigator shall have the discretion to accept relevant evidence that was not previously available or known to exist, and that was not previously discoverable with the exercise of reasonable diligence.

The investigator will consider the parties' written responses before finalizing the investigation report.